

March 7, 2022

Governor Gavin Newsom  
1303 10th Street, Suite 1173  
Sacramento, CA 95814

Dear Governor Newsom:

The leaders of nations throughout the world concluded their negotiations in Glasgow last year with promises to reduce greenhouse gas emissions in this decisive decade. This year is critical to making those promises real in California and securing the state's reputation as a climate leader. You and the Air Resources Board (ARB) are about to make important decisions to shape the next California clean vehicles rule, a key policy to limit California's single-biggest source of emissions.

As conservation, environmental justice, community, health, faith, and civic organizations representing millions of Californians, we call on you to take more aggressive action to clean up the California passenger-vehicle fleet and ensure that the transition to zero-emission vehicles is just and equitable. ARB's current proposal for the ACC II regulation is not nearly strong enough to aggressively advance the market for zero-emission vehicles (ZEVs) and push California to meet its ambitious climate targets as mandated by SB 32. We urge you to use the authority and weight of your office to direct the Air Resources Board to fix these serious shortcomings, and specifically to:

- Require strong ZEV targets in earlier years to drive the market forward, rather than rely on progress in later years, and analyze the benefits from an earlier target for 100% ZEV sales.
- Pursue *mandatory* measures that promote equity and a just, green economic recovery by creating family-supporting, high-road jobs while ensuring that low-income communities of color have greater and more equitable access to zero emission vehicles as well as other clean mobility options and their associated benefits.
- Adopt standards that include significant pollution reductions from all gas-powered cars and light trucks sold over the next decade — including a minimum 7% annual decrease in greenhouse gas emissions.

**CARB's Proposal Should Require Strong ZEV Targets in Earlier Years and Analyze the Overwhelming Benefits from an Earlier Date for 100% ZEV Adoption**

California needs to achieve 100% ZEV sales sooner than 2035 to save millions of tons of carbon pollution, improve health outcomes across the state, and spur the industry to evolve faster both in California and in other states. Research shows that achieving 100% ZEV sales by 2035 is insufficient for California to reach its mandates under SB 32 and its carbon neutrality goal by

2045, and it puts President Biden's climate goals in jeopardy as well. California can only meet its climate targets if all new cars and light-duty trucks sold in the state in 2030 and beyond produce zero emissions.<sup>1</sup> CARB must fully consider the cost savings and emissions reductions that will come from higher EV adoption in the early years of the rule. It should analyze an alternative that reaches a minimum of 80% ZEV sales by 2030, and even better, one that reaches 100% by 2030. CARB's proposal and accompanying analysis must accurately capture the full benefits of the transition to EVs.

### **The Rule Should Prioritize Equity and Advance a Just, Green Economic Recovery**

The transition to 100% clean vehicles is a tremendous opportunity to create family-supporting, high-road jobs. High-road jobs are those which provide family-sustaining wages and benefits, a free and fair opportunity for workers to form unions, training and advancement opportunities and hiring opportunities for historically disadvantaged workers. CARB should work with the Labor and Workforce Development Agency as well as other agencies, community groups, and labor partners to expand opportunities for communities of color and low-income communities, including increased access to high-quality jobs with benefits in the clean transportation sector. Electric vehicle employers should have good track records on health and safety and a history of good contracts with unions, at a minimum entering into neutrality agreements.

In speeding ZEV adoption, CARB must also ensure low-income communities and communities of color have greater access to zero-emission vehicles. These communities have been worst hit by on-road, drilling, and refinery pollution, and emphasis should be placed on ensuring that these same communities benefit from new zero emission technology first and foremost. Accordingly, this rule should secure *mandatory* equity commitments while promoting purchase incentives, charging infrastructure, and practical and accessible shared mobility in environmental justice communities. These commitments should not be countable against the rule's other stringency targets. Finally, CARB should work with other state agencies to promote a transportation system that is less dependent on passenger cars. Strong investments in public transit and other clean mobility options like active transportation would also ease many of the burdens low-income communities of color face and is crucial to advance a more equitable transportation system.

### **The Next Clean Cars Rule Must Require a Minimum of 7% Annual Emissions Reductions from New Gas-Powered Cars and Trucks**

The next car standards must ensure that the remaining fossil-fuel vehicles sold this decade are cleaner. Most vehicles that are sold in the next few years will be gas-powered vehicles, and these light duty trucks and cars will remain in operation for as long as 20 years. Therefore, CARB should mandate a 7% annual improvement in emissions, up from the roughly 5% annual

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<sup>1</sup> Fleming, John, [All-Electric Drive: How California's Climate Success Depends on Zero-emission Vehicles](#), Center for Biological Diversity (2020).

improvement of the Obama standards. Because this 5% annual improvement has already been declared achievable by CARB and others, and because CARB itself has stated that this 5% could be strengthened, a slight increase to 7% is eminently feasible, especially because many auto companies are not fully using technology that already exists to make petroleum cars less polluting.

With the climate emergency worsening each day, there is no time for delay. This new rulemaking will be critical locally, nationally, and globally. As the world's fifth-largest economy, California must continue to lead the way to decarbonize the passenger-vehicle fleet at the speed required by science and justice. We can and must accelerate the transition to a zero-emission fleet of vehicles, and mandate cleaner petroleum vehicles in the interim. At this pivotal moment such an effort will require strong leadership from you to direct CARB to regulate with the true urgency of climate change and equity in mind.

Sincerely,

1. 350 Bay Area
2. 350 Conejo / San Fernando Valley
3. 350 East Bay
4. 350 Humboldt
5. 350 Santa Barbara
6. 350 Silicon Valley
7. Acterra: Action for a Healthy Planet
8. Active San Gabriel Valley
9. Alameda County Interfaith Climate Action Network
10. Albany Climate Action Coalition
11. Alliance of Nurses for Healthy Environments
12. Berkeley Electrification Working Group
13. California Democratic Party Environmental Caucus
14. California Environmental Justice Alliance
15. California Interfaith Power & Light
16. California Nurses for Environmental Health and Justice
17. Center for Community Action and Environmental Justice
18. Center for Biological Diversity
19. Center for Climate Change and Health
20. Center on Race, Poverty & the Environment
21. Central California Asthma Collaborative
22. Central California Environmental Justice Network
23. Charge Across Town
24. Climate Action Now
25. Climate Hawks Vote

26. Climate Health Now
27. Climate Reality Project-Los Angeles Chapter
28. Climate Reality Project, Orange County Chapter
29. Climate Reality Project, Silicon Valley
30. Climate Reality, San Fernando Valley Chapter
31. Coltura
32. Communities for a Better Environment
33. Corporate Ethics International
34. Earth Action, Inc.
35. Ecology Center
36. Elders Climate Action
37. Elders Climate Action - Southern California
38. Elected Officials to Protect America
39. Endangered Habitats League
40. Environmental Justice Advocates, First Unitarian Church of Oakland
41. Environmental Protection Information Center- EPIC
42. EVHybridNoire
43. Food & Water Watch
44. Fresnoans against Fracking
45. Friends of the Earth
46. Greenpeace USA
47. Indivisible Ross Valley
48. Indivisible San Francisco
49. Indivisible San Jose
50. Indivisible South Bay LA
51. Labor Network for Sustainability
52. Let's Green CA!
53. Long Beach 350
54. Long Beach Gray Panthers
55. Marin Interfaith Climate Action
56. Movement Rights
57. Northern California Solar Energy Association
58. Novasutras
59. Oil and Gas Action Network
60. Pacific Environment
61. Palms To Pines Democratic Network
62. Physicians for Social Responsibility-Los Angeles
63. Resource Renewal Institute
64. Sacramento Climate Coalition
65. San Francisco Bay Physicians for Social Responsibility

66. San Francisco Baykeeper
67. SanDiego350
68. Santa Barbara County Action Network
69. Santa Barbara Standing Rock Coalition
70. Santa Cruz Climate Action Network
71. Sequoia ForestKeeper®
72. SoCal 350 Climate Action
73. Stand.earth
74. Sunflower Alliance
75. Surfrider Foundation
76. Sustainable Mill Valley
77. The Climate Center
78. The Greenlining Institute
79. West Berkeley Alliance for Clean Air and Safe Jobs
80. Women's March Santa Barbara
81. ZEV2030

CC: Lauren Sanchez, Senior Climate Advisor, Office of California Governor Gavin Newsom

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