

**Testimony of the Environmental Defense Fund (EDF)
on the Proposed ACCII Regulation**

by Tom Cackette

June 9, 2022

I'm Tom Cackette, today representing the Environmental Defense Fund and its three million+ members.

The ACCII proposed regulation you are considering today will place CARB as the leader in our country, and most likely the world, by demonstrating a cost-effective path to zero emissions for passenger vehicles that will reduce both climate and air pollutant impacts. EDF studies confirm the large health and climate benefits of the proposed rule, and have found the price of ZEVs will be lower than your staff has projected, further improving the regulation's cost benefit ratio. And the increasing number of ZEV and ZEV models on the road is evidence that the transition to zero emission vehicles has already taken off.

The opportunity facing the Board today is to grab this trend, accelerate it, and help assure it stays on a path to 100% ZEV sales by 2035. This is the time for bold and decisive action given the enormous stakes.

EDF has two requests of the Board today that will further improve the proposed regulation.

The first request is for the Board to direct the staff to work with interested parties before the August Board meeting to provide greater assurance that equity provisions in the rule will be used by the OEMs. Despite concerns raised by the EJ/NGO communities, the current staff equity proposal is entirely voluntary and could result in little or no OEM equity participation. The EJ/NGO communities have been working with ARB for a year to find the best approach to assure disadvantaged communities contribute to and benefit from the ACCII rule, and have offered an approach that would increase the probability of OEM participation while meeting ARB's desire the program not be mandatory for OEMs. This compromise approach is not reflected in the proposal in front of you

today. Our request of you is to direct the staff to improve the equity provisions for you to consider at the August second hearing, to ensure that they achieve the intended health benefits in disadvantaged communities.

Our second request of the Board is to direct the staff to develop for your consideration a greater level of ZEV ambition in 2030. EDF submitted detailed analysis along with our comments showing significantly declining ZEV costs that are lower than your staff projected and market data underscoring the rapid transition already underway – both of which support greater levels of ZEV sales in 2030. Remember that every ZEV that gets on the road will result in fewer CO₂ emissions remaining in the atmosphere for hundreds of years - more and earlier is better for the climate.