

**Testimony of the Environmental Defense Fund (EDF)  
On Adoption of the ACCII Regulation**

By Tom Cackette  
August 25, 2022

I'm Tom Cackette, representing the Environmental Defense Fund and its more than 3 million members.

Your approval today of the ACCII regulation will once again confirm CARB's global leadership in addressing transportation sector pollution.

Your staff has quantified the many environmental and economic benefits of zero-emission vehicles.

EDF analysis has confirmed the benefits of ACCII, finding it could:

- Prevent more than 7,400 premature deaths, and
- Eliminate more than 1.2 billion tons of climate pollution, both by 2050, and,
- Save Californians who buy a ZEV in 2035 more than \$13,000 over the life of the vehicle, compared to a gas-powered car.

**We ask you to adopt this much-needed regulation today, as proposed.**

Building from this progress, there is more work to be done. For example, there remain uncertainties regarding the degree of vehicle manufacturer utilization of the voluntary equity provisions in the rule. Also, your staff's modeling demonstrates that additional emission reduction programs beyond ACCII will be necessary to achieve net-zero passenger vehicle emissions by 2045, the Governor's goal.

Accordingly, we join environmental justice and community groups in asking you to strengthen the Resolution to provide increased accountability and transparency through additional staff analysis and reporting, specifically on the:

- Effectiveness of ACCII equity provisions and other opportunities to improve equity, and
- Opportunities beyond ACCII to further reduce passenger vehicle emissions toward zero in order to meet air quality and climate goals.

We have provided amended Resolution language that we ask you to adopt.