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**Sent:** Friday, November 11, 2022 7:50 AM

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**Subject:** Request to Support and Advance Advanced Clean Cars II, Advanced Clean Trucks+ Rules

Dear Members of the Vermont Legislative Committee on Administrative Rules,

In our individual capacity as the co-leads of the Transportation Task Group of the Vermont Climate Council, we are writing to underscore the importance of the Advanced Clean Trucks (ACT), Advanced Clean Cars (ACC) II, Low NOx Heavy-Duty Omnibus, and the Phase II Greenhouse Gas Emissions Standard Rules (the “Rules”) that are before you for action. These Rules will ensure that cleaner, more affordable and efficient cars and trucks are delivered to Vermont and made more widely available to Vermonters. These Rules are also absolutely foundational to Vermont meeting the pollution reduction requirements established by the Global Warming Solutions Act.

For almost two years, we have been working hard through the Vermont Climate Council process, the multi-stakeholder Transportation Task Group and various other stakeholder and public engagement arenas to help identify and craft the transportation recommendations of the first legally required Climate Action Plan (CAP). Like 17 other states and jurisdictions – including neighboring Massachusetts, Connecticut and New York – the Transportation Task Group, the Cross-Sector Mitigation Subcommittee and the Vermont Climate Council identified these Rules as a cornerstone to reducing transportation sector air pollution and greenhouse gasses in Vermont.

Under Section 177 of the Clean Air Act, Vermont adopted California’s Advanced Clean Cars (ACC) rules nearly three decades ago to put Vermont on a path of improving air quality and reducing carbon emissions. Failure to adopt the amendments to the Clean Cars program would revert Vermont back to weaker federal regulations, greatly reduce availability of electric vehicles in Vermont (and thus Vermonter’s access to electric vehicle technology) and delay the state achieving the GWSA’s required carbon reductions.

The Rules are in line with Vermont’s long-time commitment to date. Vermont joined the first iteration of this Advanced Clean Cars program in 1996. On July 13, 2020, Governor Scott committed Vermont’s support for clean electric trucks when he signed the [Multi-](#)

[State Zero Emission Medium- and Heavy-Duty Vehicle Initiative - Memorandum of Understanding](#). Before that, Governor Peter Shumlin signed Vermont onto [the Multi-state Zero Emission Vehicle MOU in 2013](#). And Vermont state agencies have been working with other states and readying for Vermont to participate in this next iteration (ACCII and ACT) of this multi-state program to deliver cleaner, more affordable cars and trucks to Vermonters.

As you know, transportation pollution is the largest source of climate-disrupting and toxic air pollution in Vermont. The transportation sector accounts for 39.1% of Vermont's greenhouse gas emissions. Fossil fuel-powered cars, trucks, and buses account for the majority of these emissions. Vermont must adopt the Rules this year to have a fighting chance of meeting the carbon emission reduction requirements. At the same time, volatile prices at the pump over this past year point to the need for Vermont to join a growing number of other states and countries – and a maturing automobile manufacturing market – and ready our state for cleaner and more cost-effective 21st century vehicles.

These Rules are a core component of transforming our transportation sector to one that is more clean and affordable. Adoption of these Rules doesn't require consumers or fleet owners to immediately transition to zero-emission vehicles, nor will anyone be coming for anyone's older gas or diesel powered vehicle. These programs are targeted at ramping *new* electric vehicle sales and designed to support and enforce a gradual market transition to make cleaner, more affordable and efficient vehicles increasingly available to Vermonters over the next decade and beyond.

These Rules are identified as a core transportation electrification pathway of the Climate Action Plan (CAP), including, but not limited to:

- *Electrification of the light duty sector (autos, SUVs and light duty trucks) including establishing the charging infrastructure to support an efficient and integrated electric vehicle network and reducing the barriers low and moderate income Vermonters face purchasing and owning electric vehicles.*
- *Electrification and lowering the carbon intensity of fuels in the heavy-duty sector (mid sized and heavy duty trucks and buses). This also includes the charging infrastructure to support the electrification of medium-to-heavy duty vehicles. ([Vermont Climate Action Plan, p.70](#)).*

We respectfully request that you take swift action to advance these Rules for their adoption in line with the Climate Action Plan and the Global Warming Solutions Act to ensure more Vermonters can access cleaner vehicles starting in model year 2026. The Rules are critical to help improve air quality, lower transportation costs, help address environmental health inequities and significantly reduce greenhouse gas emissions.

We thank you for your work, thank you in advance for your consideration and advancement of these Rules this year and are happy to assist in providing more information about the Rules, the Climate Action Plan and the Plan's transportation components. Please do not hesitate to reach out.

Appreciatively,

Johanna Miller, *House-Appointed Member of the Vermont Climate Council and Co-Lead of the Transportation Task Group* - [Johanna.Miller@partner.vermont.gov](mailto:Johanna.Miller@partner.vermont.gov)

Gina Campoli, *Appointed Cross Sector Mitigation Subcommittee Member and Co-Lead of the Transportation Task Group* - [Gina.Campoli@partner.vermont.gov](mailto:Gina.Campoli@partner.vermont.gov)

cc:

House Speaker Jill Krowinski

Senate President Pro Tem Becca Balint

Julie Moore, Secretary of the Vermont Agency of Natural Resources

Richard Cowart and TJ Poor – Co-Chairs of the Vermont Climate Council's Cross-Sector Mitigation Subcommittee

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*Vermont Natural Resources Council/House Appointed Member of the Vermont Climate Council*

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