

August 23, 2023

Katie Dykes

Commissioner

Connecticut Department of Energy and Environmental Protection

Via electronic mail: [deep.mobilesources@ct.gov](mailto:deep.mobilesources@ct.gov) cc: [Katie.Dykes@ct.gov](mailto:Katie.Dykes@ct.gov)

**RE: Support for Connecticut's adoption of the Advanced Clean Cars II regulation**

Dear Commissioner Dykes,

We, the undersigned environmental, environmental justice, labor, social justice, clean energy, sustainability and transportation groups, write to you today to express our strong support for Connecticut's adoption of the Advanced Clean Cars II (ACC II) regulation before the end of 2023.

ACC II will clean up our local air, improve public health, bolster our economy, and reduce climate-harming greenhouse gas emissions.

The ACC II regulation requires vehicle manufacturers to sell an increasing percentage of new zero-emission light-duty vehicles starting in 2026, reaching 100% new sales by 2035. If adopted this year, Connecticut will implement the program starting with Model Year 2027. It is crucial for Connecticut to adopt ACC II as soon as possible, otherwise it will risk losing a model year of the program each year it delays. Zero-emission vehicles (ZEVs) do not release tailpipe pollution, and will result in cleaner, healthier air, and reduced greenhouse gas emissions. While the sales of ZEVs continue to grow, gas vehicles will continue to be sold, which is where the low-emission vehicle (LEV IV) component of the ACC II program comes into effect. The LEV IV program is included in ACC II and requires automakers to produce progressively cleaner vehicles with more durable emission controls. These regulations will result in crucial public health, environmental, and economic benefits for Connecticut residents. It is vital for Connecticut to adopt the ACC II and LEV IV rules this year to avoid missing a model year and the associated public health, environmental, and economic benefits.

**The ACC II rule will deliver significant public health benefits to Connecticut residents.**

The transportation sector is a major source of air pollution and disproportionately contributes to nitrogen oxide (NOx), carbon dioxide (CO2), and particulate matter (PM2.5). These pollutants harm public health, especially in low-income communities and communities of color. For example, years of discriminatory land use and transportation policies have resulted in Asian-American, Black, and Latino communities being disproportionately burdened with PM2.5 air pollution from vehicles. [Recent analysis](#) by the American Lung Association found that by requiring 100% passenger vehicle sales by 2035, Connecticut can see \$11.5 billion in cumulative health benefits between 2020-2050, avoid 1,060 premature deaths, 22,900 asthma attacks, and 120,000 lost work days. By adopting ACC II, Connecticut can [reduce total](#) NOx and PM2.5 emissions by 580 and 39 tons/year, respectively. The ACC II rule is one of Connecticut's best available tools for delivering much needed public health benefits.

**The ACC II rule will put Connecticut back on track to reach its emission reduction goals.**

According to Connecticut's Department of Energy & Environmental Protections recent Greenhouse Gas (GHG) Emissions inventory, the transportation sector accounts for [approximately 39%](#) of the state's total emission profile and remains the largest emitter. Connecticut is not on track to meet the [29% reduction](#) of emissions in this sector that the Governor's Council on Climate Change determined is crucial to meet the Global Warming Solutions Act 2030 goal. To reach its 2030 emissions target, the Governor's Council on Climate Change estimated that roughly half a million light-duty electric vehicles must replace polluting internal combustion vehicles. By requiring automakers to steadily and gradually increase their sales of new EVs, the ACC II program is a valuable tool that Connecticut can implement to get back on track to reach its climate goals. It is [estimated](#) that by 2040, implementation of the ACC II rule could reduce GHG well-to-wheel emissions by 39.5 million metric tons.

**The ACC II rule will support in-state business and attract investments in Connecticut.**

The regulation can stimulate the creation of high-quality zero-emission manufacturing and charging installation jobs in our state. [Recent analysis](#) from ICCT estimates that the net benefits of adopting the ACC II rule this year is \$272.7 million dollars. Deferring consideration and implementation of ACC II in Connecticut risks hindering the advancement of the market for zero-emission light duty vehicles. If Connecticut doesn't adopt the ACC II rule, we could lose out on the clean energy economy emerging in other states and the associated economic benefits.

For all these reasons, we strongly support the adoption of the ACC II regulation. **Please adopt the ACC II rule before the end of 2023 to clean up our local air, improve public health, bolster our economy, and reduce climate-harming greenhouse gas emissions. With each year that Connecticut delays adopting ACC II the state misses another model year of the programs and the subsequent public health, environmental, and economic benefits.**

Signed,

Jayson Velazquez  
Climate and Energy Justice Policy Associate  
Acadia Center

Ashley Blount  
Executive Director  
Black Infinity Collective

Anne Hulick  
CT Director  
Clean Water Action

Susan Eastwood  
Chair  
Ashford Clean Energy Task Force

Diane Lentakis  
Volunteer  
Climate Reality Project, Southern CT Chapter

Tom Swan  
Executive Director  
Connecticut Citizen Action Group

Sharon Lewis  
Executive Director  
Connecticut Coalition for Economic and  
Environmental Justice

Sanjiv Godse, MD  
Chair  
Connecticut Health Professionals for Climate  
Action (CHPCA)

Lori Brown  
Executive Director  
Connecticut League of Conservation Voters

Aziz Dehkan  
Executive Director  
Connecticut Roundtable on Climate and Jobs

Daphne Dixon  
Director, Connecticut SWA Clean Cities Coalition  
Executive Director, Live Green Connecticut

Shannon Laun  
VP & Director CLF Connecticut  
Conservation Law Foundation

Barry Kresch  
President  
Electric Vehicle Club of CT

Larissa Koehler  
Director, Vehicle Electrification  
Environmental Defense Fund

Mary Hogue  
Chair  
Fairfield Forestry Committee

Carrie Firestone  
Co-Founder  
ForwardCT

Andrea Marpillero-Colomina  
Sustainable Communities Program Director  
GreenLatinos

Ivelisse Correa  
Executive Director/Legislative Policy Director  
GTA860 and BLM860

John Hall  
Executive Director  
The Jonah Center

Nathan Frohling  
Director of External Affairs  
The Nature Conservancy in Connecticut

Kathy Harris  
Senior Advocate  
Natural Resources Defense Council

Chris Schweitzer  
Director  
New Haven Leon SCP

Kimberly Stoner  
Director of Advocacy  
Northeast Organic Farming Association of  
Connecticut (CT NOFA)

Mark Scully  
President  
People's Action for Clean Energy

Joel Levin  
Executive Director  
Plug In America

Andy Bauer  
Chair  
Portland Clean Energy Task Force

Robbie Goodrich  
Executive Director  
RACCE

Abigail Roth  
Safe Streets Coalition of New Haven

Samantha Dynowski  
State Director  
Sierra Club Connecticut

Bob Wall  
Chair  
Sustainable Fairfield Task Force

Johanna Martell  
Co-director  
Sustainable Westport

Rev. Dr. Davida Foy Crabtree  
Co-Facilitator  
Third Act Connecticut

Jay Stange  
Coordinator  
Transport Hartford Academy at the Center for  
Latino Progress

Darwin Keung  
Research and Policy Manager  
Tri-State Transportation Campaign

Kevin Shen  
Policy Analyst  
Union of Concerned Scientists

Eric J. Weiner  
Vice President  
Windsor Climate Action

Joel Gordes  
Environmental Advocate