



July 24, 2025

Michelle Buffington
Division Chief for Mobile Sources
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Forward Recommendations, Pursuant to Executive Order N-27-25

Dear Dr. Buffington:

The Coalition for Clean Air strongly agrees with Executive Order N-27-25's reaffirmation of the State's commitment to accelerate the deployment of zero-emission technologies, including passenger, medium, and heavy-duty vehicles. In fact, that acceleration is essential to meeting legally mandated targets for reducing the emissions that are wreaking climate chaos and causing California to have the nation's worst air pollution.

We offer these recommendations to hasten the transition to zero-emission transportation.

HEAVY-DUTY VEHICLES

Accelerate Zero Emission Trucks Measure

Requiring the retirement of old heavy-duty diesel trucks is probably the single biggest step that CARB could take to reduce air pollution in California. Adopting such a measure would require no additional statutory authority or federal approval; it would only take a willingness by the Board to take this life-saving step. CARB's Mobile Source Strategy already includes a future measure to retire old diesel trucks at the end of their useful lives. Without the Advanced Clean Fleets rule, the need for that solution has become even more urgent, so it should be expedited.

Prioritize ZE Infrastructure in Trade Corridor Enhancement Program (TCEP)

The California Transportation Commission (CTC) spends hundreds of millions of dollars annually on TCEP, and many of the projects actually increase emissions by expanding highway capacity. Instead, CTC and CalTrans should prioritize investments in charging/fueling infrastructure for ZE freight.

Adopt Indirect Source Review (ISR) Rules

The Clean Air Act defines an indirect source as “a facility, building, structure, installation, real property, road, or highway which attracts, or may attract, mobile sources of pollution.” For example, a warehouse or port could be an indirect source; it does not produce significant emissions itself, but it causes concentration of mobile sources in a place they may not otherwise have been. ISR rules should be adopted by air districts and CARB to reduce those emissions and foster deployment of zero-emission technologies. The South Coast Air Quality Management District’s warehouse rule is already having a beneficial effect in that region.

Establish “Green Lanes” at Ports

Ports can offer an incentive to ZE trucks by giving them priority access at terminals. Green Lanes or Green Gates refer to dedicated pathways, lanes, zones, corridors, or priority access systems or protocols designed to incentivize or mandate the use of zero-emission vehicles, particularly in freight and commercial transport. These often function as a mix of regulatory tools, physical infrastructure, or digital means, often in combination.

PASSENGER VEHICLES

STANDARDS

- The EO directs CARB to proceed with the development of an Advanced Clean Cars III standard. This rule will be essential to making sure that manufacturers are selling increasing numbers of ZEVs in California. CARB and the California Energy Commission (CEC) should require the cars to have bi-directional capability to improve the flexibility of the electric grid.
- CEC should deliver on long-delayed tire efficiency standards (mandated by AB 844 in 2003), which will make ZEVs — as well as gas-burning cars — more efficient. We estimate that ensuring replacement tires are as efficient as tires on a brand-new car would save EV drivers \$161 on electricity over the lifetime of a set of tires, as well as eliminating 1490 tons of Nox, 106 tons of PM 2.5 and 2.4 million metric tons of CO2 annually from gas-burning cars.
- For transportation electrification to succeed, the refueling experience must be dependable and convenient. Drivers should be able to approach a public charging (or hydrogen) station – especially one that has been built with public funds -- with the same confidence with which they would drive into a gas station. Unfortunately, this is not always the case at present. Therefore, CEC should adopt Regulations for Electric Vehicle Charger Inventory, Utilization, and Reliability Reporting soon.

INCENTIVES

- Given the State's limited resources, all light-duty incentives should be targeted to those who need them most -- the low and moderate income drivers for whom the upfront vehicle cost of an EV is a barrier. CARB and CEC's equity programs need consistent and sufficient funding.
- Clean Cars 4 All should be expanded, with both the district and statewide programs amply funded. In the short term, CARB should implement this year's budget language requiring reallocation of existing funds to district programs that meet the specified criteria;
- The State should also expand funding for mobility options that allow people to access ZEVs without car ownership; car-sharing, van-pooling and e-bikes expand access to zero-emission transportation while reducing vehicle miles travelled. CalSTA should prioritize infrastructure that makes biking and walking safe and convenient;
- CEC should increase infrastructure support to multifamily homes and continue supporting rural and disadvantaged communities, because those Californians are the least likely to be served by charging infrastructure. As one of the leaders of the Charge Ahead California campaign, we advocate for a zero-emission transportation transition that leaves none of our residents behind.

CROSS-SECTORAL SOLUTIONS

Adopt Fleet Standards

California can require pollution reductions in fleets that are in use in the state and has done so, without needing any federal approval. Public fleets should be role models and transition quickly to ZEVs. The State should be purchasing only ZEVs for its light-duty fleet.

CARB should also require private fleets to increase their percentages of zero-emission miles. CARB has set such a standard for ride-hailing fleets; that standard should be vigorously enforced by the California Public Utilities Commission, or the Legislature should move the enforcement responsibility to CARB.

The State should negotiate bulk purchasing discounts for EVs, and should consider whether it can make those discounts available to private fleets.

Dedicate Cap-and-Invest Revenue to ZEVs

Much of the funding for California's ZEV incentives has come from the Greenhouse Gas Reduction Fund (GGRF), but that funding has waxed and waned, while other programs have been continuously appropriated. As legislators and the Governor consider reauthorizing the overall cap-and-trade program, we urge them to elevate ZEV funding as one of the categories that is consistently funded by the GGRF. At the same time, reauthorization can increase GGRF revenues substantially and make polluters pay by removing the statutory free allowances granted to the oil industry and by narrowing out-of-state offsets.

Use Low Carbon Fuel Standard (LCFS) to Incentivize ZEVs

In the short term, CARB should roll out the medium and heavy-duty incentive program it established in the recent LCFS amendments. When CARB next amends the LCFS, it should make sure that the program is helping the State to reach our ZEV targets as much as possible.

Charge Petroleum Guzzlers, Incentivize ZEVs

The Legislature should establish market-based incentives for light and heavy-duty vehicles by assessing fees on the most polluting vehicles and using the revenues to bring down the purchase price of new and used ZEVs.

Enforce Permit Streamlining Laws for Charging Stations

AB 1236 (Chiu, 2015) and AB 970 (McCarty, 2021, which we co-sponsored) require local governments to streamline their permitting processes for charging stations. Yet Go-Biz' Permitting Scorecard shows that 108 jurisdictions have still not streamlined their processes. Attorney General Bonta should bring enforcement actions against the recalcitrant jurisdictions.

Include Off-Road Engines

Off-road engines, including locomotives, marine vessels, and construction, mining and agricultural equipment, are responsible for a large and growing share of California's emissions. Executive Order N-79-20 in 2020 established a goal of "100 percent zero-emission off-road vehicles and equipment by 2035 where feasible." CARB should continue and redouble its efforts to reduce emissions from this sector.

Respectfully,



Bill Magavern
Policy Director