Governor Maura Healey Massachusetts State House 24 Beacon St., Office of the Governor, Room 280 Boston, MA 02133

May 2, 2025

Dear Governor Healey:

We, the undersigned 70 environmental, environmental justice, consumer, public health, housing, labor, and community organizations and businesses urge you to stay the course and implement the Advanced Clean Cars II (ACCII) regulations beginning with model year 2026, as planned.

ACCII is designed to facilitate the gradual transition of the fleet to electric vehicles (EVs) by requiring manufacturers to increase the availability of EVs year over year. The obligation to comply sits with *automakers*, not dealers or customers. Compliance is feasible in Massachusetts thanks to the variety and availability of passenger EVs, flexibilities built into the rule, and Massachusetts' strong support for electrification via complementary state programs, not to mention the ingenuity and leadership of businesses across the Commonwealth. Supportive state policies, such as the Department of Energy Resources' MOR-EV incentive program, Department of Environmental Protection's MassEVIP fleet and charger incentive programs, our electric utilities' charging incentive programs, various Massachusetts Clean Energy Center programs, and the coordination of the Electric Vehicle Infrastructure Coordinating Council, *complement* ACCII but cannot supplant it. These existing public programs enjoy popular support across the Commonwealth, and delaying ACCII would undermine their success and reach.

We need ACCII to:

- Protect public health: Fossil-fuel powered vehicles are responsible for noxious air pollution that harms human health. These impacts are most acutely felt in communities of color and low-income communities. Delaying ACCII would delay reductions in these harmful emissions, at a time when air quality in Massachusetts is getting worse.¹
- Reduce greenhouse gas emissions: Transportation is the largest sector source of greenhouse gas emissions in the Commonwealth, and implementing ACCII is a key strategy in the Commonwealth's Clean Energy and Climate Plan for 2025 and 2030. Without ACCII, it is undeniable that we will be unable to reduce greenhouse gas emissions 50% by 2030 as required by state law.
- Protect consumer choice: Section 177 states see more EV variety and availability than non-Section 177 states. Without ACCII, Massachusetts residents and businesses will have less access to the EV models that can help them save money on fuel and maintenance, and the

¹ Douglas, Erin, "Air quality is getting worse in coastal New England," Boston Globe, April 23, 2025, available at: <u>https://www.bostonglobe.com/2025/04/23/science/air-quality-lung-association-new-england-report/</u>

market for used EVs will not grow as quickly or robustly.

Automakers and fossil fuel companies are waging a national campaign against ACCII, both federally and within Section 177 states. We were extremely disheartened by the Executive Order issued by the Governor of Maryland to delay implementation of ACCII by two years without any process for public comment. The Trump administration is attempting to revoke the waivers granted by the Environmental Protection Agency for ACCII and may very well go after the legal framework that allows states to adopt vehicle regulations that are stricter than federal standards. Unless or until Congress revokes states' authority to implement vehicle emissions standards, states must take full opportunity to facilitate the transition. It's more important than ever for Massachusetts to stand firm and not delay ACCII.

Sincerely,

350 Mass Acadia Center All In Energy Alliance for Climate Transition Allston Brighton Health Collaborative Alternatives for Community & Environment, Inc. Andover WECAN Arise for Social Justice Berkshire Environmental Action Team (BEAT) Better Together Brain Trust, LLC dba BT2 Energy Black Economic Council of Massachusetts (BECMA) **Brookhaven Residents Climate Change Committee** Cape Ann Climate Coalition Organizing Committee Center for EcoTechnology (CET) Ceres ChargePoint **Clean Water Action** Climate Code Blue **Climate Reality Project Massachusetts Southcoast** Commonwealth Green Low-Income Housing Coalition **Conservation Law Foundation Cooler Communities** Edgartown Climate Committee Eastie Farm **Elders Climate Action Mass Chapter Environmental League of Massachusetts** Gas Transition Allies (GTA) Greater Boston Physicians for Social Responsibility (GBPSR) Green Energy Consumers Alliance

GreenLatinos Green Weymouth Health Care Without Harm Hingham Net Zero International Brotherhood of Electrical Workers Local 103 It's Electric, Inc. Living the Change Berkshires Lee Greener Gateway Committee Lexington Climate Action Network (LexCAN) LISC Massachusetts Massachusetts Climate Action Network Massachusetts Interfaith Power & Light Mass Audubon MassEnergize Metropolitan Area Planning Council (MAPC) Mothers Out Front, Arlington Mothers Out Front, Bedford Mothers Out Front, Newton Mothers Out Front, Northampton Mothers Out Front, Sommerville MoveEV, Inc. National Wildlife Federation Net Zero Foundation Newton EV Task Force Plug In America **Quincy Climate Action Network Renew Worcester Revitalize Community Development Corporation** Salem Alliance for the Environment (SAFE) Sierra Club Massachusetts Spark Energy Conservation Sustainable Middleborough Sustainable Wellesley Sustainable Winchester **Transform Power Systems** Transportation for Massachusetts (T4MA) **Union of Concerned Scientists Upper Charles Climate Action** Western Mass Transportation Advocacy Network (WMTAN) Westside Legends Williamstown COOL Committee ZeroCarbonMA