To: Department of Environmental Quality  
From: Alexa Diaz, Senior Policy Manager  
Date: October 19, 2022  
RE: Support for Advanced Clean Cars II

Dear Department of Environmental Quality Staff,

Thank you for the opportunity to provide comment in support of the adoption of the Advanced Clean Clean Cars II (ACCII) rule this year in Oregon. My name is Alexa Diaz and I am a Senior Policy Manager for Forth. Forth is a non-profit organization dedicated to the equitable advancement of clean transportation. For more than a decade, Forth has been building program and policy models that significantly expand equitable access to electric transportation in the U.S. and beyond.

As you know, Oregon has ambitious greenhouse gas reduction goals, and we are already behind in meeting them. Given that the transportation sector is now the biggest component of our state’s greenhouse gas emissions, it is critical that we take steps to get those transportation emissions headed down – and quickly. Dramatically increasing the use of electric vehicles is one of the most significant steps we can take to reduce those transportation emissions. The Legislature recognized this and passed the Standard Rebate and the Charge Ahead Rebate to incentivize the purchase of electric and hydrogen vehicles. Forth is generally supportive of policy proposals that would speed up Oregon’s EV adoption and Forth specifically supports the Advanced Clean Cars II rulemaking.

Adopting Advanced Clean Cars II rules will help advance equity in Oregon. These rules will make affordable, zero-emission vehicles more available to historically underserved and frontline communities. Under-represented households spend a larger proportion of their income on fuel and will benefit from more efficient and reliable transportation options. Implementing Advanced Clean Cars II will decrease fuel costs and will help lower-income families.

With the Standard and Charge Ahead rebate programs, Oregon’s investment in charging infrastructure, the adoption of Advanced Clean Cars II rules, and the expansion of the Clean Fuels Program, transportation costs will be lowered for Oregonians while also substantially reducing transportation-related greenhouse gas emissions. The DEQ should further encourage and support transportation electrification modes as detailed within ODOT’s Transportation Electrification Infrastructure Needs Analysis (TEINA) and the upcoming TEINA Micromobility report, along with future modes of transportation electrification as it oversees the Oregon Department of Transportation and the States $5.1 billion transportation budget.

Thank you for your time and the opportunity to comment.

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