



November 10, 2025

Chair Lauren Sanchez and
Members of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

Via electronic submittal

RE: Comments on Emergency Amendment and Permanent Adoption of the Emergency Vehicle Emissions Regulations

Dear Chair Sanchez and Members of the Board,

On behalf of our coalition of public health, environmental justice, equity, community, business, science, and environmental organizations, we respectfully submit the following comments in support of the California Air Resources Board's ("CARB") Emergency Amendment and Permanent Adoption of Vehicle Emissions Regulations ("Emergency Regulation").

We greatly appreciate CARB's continued leadership in securing an equitable, zero-emission future, especially in the face of an unprecedented convergence of federal and industry attacks on California's long-established authority to protect its residents from dangerous air and climate pollution. These attacks strike at the very foundation of CARB's vehicle emissions program—arguing not only against the enforceability of California's most recent rules, such as Advanced Clean Cars II ("ACC II"), Advanced Clean Trucks ("ACT"), and the Heavy-Duty Omnibus Low-NOx Regulations, but also against the continued operability of the prior regulations and emissions standards for which federal waivers were already granted and which are not themselves under challenge. Under this erroneous theory, once CARB updates a regulation, the older, previously authorized standards simply vanish, leaving CARB with no operative emissions standards under which it can certify new motor vehicles for sale in the state in the event of some action that disables the newer standards. However, those prior standards do not disappear, they remain the fallback standards for situations exactly like this.

These efforts to undermine California's regulations jeopardize the air quality protections that millions of Californians—particularly children, seniors, and residents of pollution-burdened communities—depend on for their health. By claiming that neither CARB's most recent standards nor the previously waived standards are operative, opponents would effectively strip away any enforceable emissions limits in California. That outcome would mean more smog, soot, and climate pollution in a state that already suffers from the worst air quality in the nation, with devastating consequences for frontline communities who already experience higher rates of asthma, cardiovascular disease, cancer, and other health harms. Additionally, these attacks inject unnecessary uncertainty into the vehicle market, undermining manufacturers' ability to plan and invest in the zero-emission transition. In this existential moment, it is critical for CARB to affirm its authority to enforce operative emissions standards and certify new motor vehicles. Thus we support the permanent adoption of the Emergency Regulation, which is urgently needed to safeguard Californians' health, provide certainty to industry, and reaffirm the state's leadership on clean transportation.

At the same time, we urge CARB to use its legal authority to initiate the next round of on-road vehicle emission regulations for both light and heavy-duty vehicles. We applaud CARB's initiation of the Drive Forward Initiative, and look forward to engaging throughout the rulemaking processes. Because the rulemaking process can take several years to complete, CARB should begin new rulemakings immediately so that the final regulations can be submitted to the U.S. EPA for approval by 2029. Prompt rulemaking will keep California on course and provide a clear signal to automakers, fleet operators, and other states that California remains committed to its public health and air quality goals, regardless of federal interference. Early action on new, comprehensive rulemakings also reinforces California's leadership in protecting our health and that of residents in the growing coalition of Section 177 states that incorporate CARB's rules as part of their own programs.

California cannot afford delay. Each year of inaction means more children growing up with asthma, more families losing loved ones prematurely, and more communities denied their right to breathe clean air. This Emergency Regulation is a vital and necessary backstop in this unprecedented moment, but Californians need the full suite of strong, enforceable regulations to ensure a healthier, more just, and more sustainable future.

We thank you for your leadership and support the adoption of the Emergency Regulation. Looking ahead, CARB must move quickly to begin developing light and heavy-duty vehicle standards to secure California's clean air and climate commitments. Our coalition stands ready to work with you to ensure that California's policies protect public health, address long-standing environmental injustices, and drive our clean energy economy forward.

Sincerely,

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