

# **Union of Concerned Scientists**

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November 10, 2025  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Sanchez and Members of the Board,

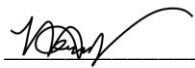
On behalf of our over 500,000 supporters, the Union of Concerned Scientists (UCS) urges the California Air Resources Board (CARB) to permanently adopt the Emergency Vehicle Emissions Regulations that CARB previously noticed as an emergency rulemaking on September 15, 2025.

UCS supports the action to permanently adopt the Emergency Vehicle Emissions Regulations. CARB must enforce the current emission regulations and needs to clarify its authority to enforce these regulations and to certify vehicles. These amendments and regulations are necessary in light of the illegal action by Congress to use the Congressional Review Act on previously granted waivers from the EPA. The Emergency Rulemaking clarifies that at a minimum, earlier adopted regulations for new motor vehicles and engines will continue to protect public health.

Manufacturers are already meeting the LEVIII and pre-Omnibus Heavy Duty emissions standards and the proposed action does not change the standards. As such, there should not be any cost impacts from its proposal to make permanent the Emergency Vehicle Emissions Regulations because compliance pathways available to manufacturers have already been understood for years and manufacturers have already achieved compliance.

California needs to ensure the health of its people, and to do so CARB needs to continue to certify that vehicles meet its emission standards. These actions by Board are important to ensure that emissions of criteria pollutants do not increase, thereby protecting public health and the environment. UCS supports CARB's efforts to clarify its authority to enforce existing emissions standards.

Sincerely,



**Michele Caneles**  
Western States Policy Advocate



**David Reichmuth**  
Senior Scientist



**Sam Wilson**  
Senior Analyst

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