

Dave Robba

Please see the attached comments submitted on behalf of Ceres.



November 10, 2025

Clerks' Office, California Air Resources Board
1001 I Street
Sacramento, California 95814

Via electronic submittal

RE: Proposed Emergency Amendment and Adoption of Vehicle Emissions Regulations

Dear Chair Sanchez and California Air Resources Board Staff,

I write on behalf of Ceres – a national nonprofit organization that works with investors, companies, and policymakers to make the business case for action on the most pressing sustainability challenges facing our economy. We strongly support California's proposed adoption of the Emergency Vehicle Emissions Regulations.

It is critical for California's economy that vehicle manufacturers can bring cleaner vehicles to market with clear guidelines on engine requirements, and, consequently, that businesses and consumers can purchase the new vehicles they need to support competitive operations and affordable livelihoods. Therefore, we appreciate CARB using the Emergency Regulations to address the regulatory uncertainty created by Congress's unprecedented revocation of the state's preemption waivers for California's Advanced Clean Cars II (ACC II), Advanced Clean Trucks (ACT), and Heavy-Duty Omnibus Low NOx (HDO) standards.

By confirming that it will certify engines that meet the criteria pollution provisions and associated on-board diagnostic requirements of the state's LEV III and pre-Omnibus regulations, CARB is not only ensuring that new vehicles can continue to be sold in the state, but also helping to preserve the automotive industry's ability to make strategic investments in low- and zero-emission vehicle models. This benefits businesses and consumers who increasingly want these vehicles because they save money and reduce pollution.

For many businesses that own or operate vehicle fleets, fleet operations are both a significant expense and source of carbon emissions that their customers and investors expect them to reduce. Clean vehicle standards like LEV III and the pre-Omnibus regulations are one of the most important mechanisms for reducing operating costs while making progress toward commitments to reduce their carbon footprints. However, businesses like the members of Ceres' [Corporate Electric Vehicle Alliance](#) (CEVA) – a collective of 32 companies with over \$1 trillion in annual revenue committed to accelerating the transition to electric vehicle (EV) fleets across all class sizes and use cases – still struggle to find the low- and zero-emission vehicles they need, in terms of both model variety and unit volume.



With EPA taking steps to repeal federal vehicle emissions standards, California standards like the LEV III and pre-Omnibus regulations are essential for these companies' ability to reliably purchase vehicles that cut costs and emissions. While preserving the LEV III and pre-Omnibus regulations alone is not enough to enable many businesses to meet their clean vehicle needs, it is an essential step to limit manufacturer backsliding that would jeopardize fleets' transition to EVs. Strong clean vehicle standards also play a critical role in driving investment in domestic production of low- and zero-emission vehicles. These investments create good-paying jobs, accelerate innovation, and help onshore supply chains for critical minerals that are essential for America's global economic competitiveness and national security.

For those reasons, we also appreciate CARB clarifying that the regulations included in this emergency action will once again be superseded by the LEV IV and Omnibus regulations should the state's legal challenge to the revocation of its preemption waivers for those regulations prevail. [Dozens of businesses and investors](#) that Ceres partners with, including CEVA members, supported the adoption of the ACC II, ACT, and HDO standards by California and nearly a dozen additional states because they believed it was the best path toward expanding access to clean vehicles.

We look forward to continuing to work with California in support of policies that expand the EV market to meet all commercial, vocational, and consumer needs at a competitive cost.

Sincerely,

Dave Robba
Senior Manager, Policy Network, Transportation
Ceres