



September 29, 2025

OAL Reference Attorney
300 Capitol Mall, Suite 1250
Sacramento, California 95814

Delivered via electronic submittal to: staff@oal.ca.gov

RE: EnviroVoters' Comments on Emergency Amendment and Adoption of Vehicle Emissions Regulations; Complementary Actions

To Whom it May Concern:

EnviroVoters is writing to express strong support for the recently proposed Emergency Amendment and Adoption of Vehicle Emissions Regulations, which would serve as a critical backstop measure in light of the uncertainty created by illegal attacks on our state's regulatory authority. We appreciate the urgent timeline that these emergency regulations set in confirming that antecedent regulations remain subject to implementation. Advanced Clean Cars II, Advanced Clean Trucks, and the Heavy-Duty Omnibus Low-NOx rule all had extreme implications for the state's ability to lower dangerous emission and yielding billions in health benefits. The revocation of these programs has created uncertainty as to what comes next, and how our state will address this gap in planned emissions reductions.

We greatly appreciate CARB's leadership in pursuing a backstop measure that reiterates what our state is still capable of acting on. Having this fallback available to the state is a much-needed safety net as we determine what policy solutions are prudent to shepherding along our state's zero emission transition. It is imperative that consumers and manufacturers remain on track with the intended impacts these regulations had established, and CARB is rising to the occasion in a moment when the state's authority has been questioned. This emergency regulation protects Californians' ability to breathe clean air, as well as maintains the ambitious progress that our state was already making to transition light and heavy-duty vehicles to zero-emission.

There are several urgent steps that CARB must undertake to capitalize upon this momentum. Per N-27-25, we understand that CARB will pursue Advanced Clean Cars III. We urge that the development of this rule, and additional new regulations that will make up for revoked rules or withdrawn waiver requests, are fully prepared to be submitted to U.S. EPA for approval by 2029. It is imperative that these rules are set up to be approved and adopted as soon as possible. Additionally, we urge CARB to pursue strategic incentive development that will facilitate thorough adoption of ZEVs. In particular, the loss of the federal tax credit this month will undoubtedly have impacts on demand for clean cars.



Bolstering existing incentive programs or backfilling the credit program due to this absence is necessary to instill consumer confidence **that the transition to clean transportation is affordable, accessible, and equitable.**

We appreciate CARB's swift action defending California's ability to continue moving the needle on our zero-emission transportation goals. EnviroVoters remains committed to engaging with the agency on upcoming regulations and additional actions that support the clean transportation transition.

Regards,

A handwritten signature in black ink, appearing to read "Gracyna Mohabir".

Gracyna Mohabir
Clean Air & Energy Regulatory Advocate

CC: cotb@arb.ca.gov