



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

September 26, 2025

SUBMITTED ELECTRONICALLY TO: staff@oal.ca.gov; cc: cotb@arb.ca.gov

Re: Emergency Amendment and Adoption of Vehicle Emissions Regulations

Rivian appreciates the opportunity to comment on the emergency amendment and adoption of vehicle emissions regulations. We are grateful for CARB staff's continued efforts to keep industry informed and to ensure that new vehicles and engines can continue to be sold in California amid regulatory uncertainty.

We are committed to providing feedback on current and future clean vehicle programs, including how new programs or flexibilities might impact the vehicle market from our perspective as an EV manufacturer and charging provider.

Emergency Situation

Rivian agrees that this Emergency Amendment and Adoption is appropriate given the economic and environmental impacts of legal uncertainty on automobile manufacturers and the general population. These potential effects on health, safety, and general welfare meet the definition of "emergency" under California Government Code section 11432.545.



Alternate Sections

This amendment would allow regulated parties the choice of following either new or existing sections of regulation unless and until a jurisdiction issues a final ruling on the applicable Clean Air Act waiver. Rivian encourages CARB to consider adopting additional language or developing a Manufacturer Advisory Correspondence to ensure that manufacturers certifying to a more stringent standard are not harmed by the loss of greater compliance margins should a final ruling revert regulations to less stringent standards.

Conclusion

Rivian appreciates the opportunity to provide feedback, supports the need for this emergency action, and requests assurance that over-compliance margins will be maintained should CARB revert to less stringent standards.

Sincerely,

Chris Nevers
Senior Director, Public Policy
cnevers@rivian.com