

Jason Cole

[Date: June 12, 2026]

Office of Administrative Law

300 Capitol Mall, Suite 1250

Sacramento, California 95814

RE: Comments on the Proposed Readoption of Emergency Vehicle Emissions Regulations

I am writing to share my concerns regarding the California Air Resources Board's (CARB) proposal to readopt the "Emergency Vehicle Emissions Regulations" for an additional 90 days.

While I recognize the importance of long-term environmental goals, I am concerned about the continued reliance on emergency rulemaking. Extending these regulations for successive 90-day periods creates a cycle of uncertainty that complicates planning for businesses and residents alike. Regular, predictable regulatory processes are essential for economic stability and for building public trust in how these policies are implemented.

I am particularly troubled by how these requirements, specifically as they apply to government contractors, are stifling competition in the marketplace. By requiring that private fleets—which are often contracted to perform essential public services—meet strict zero-emission vehicle (ZEV) mandates, the state is inadvertently creating a significant barrier to entry.

For many smaller, local, or highly specialized contractors, the transition to ZEVs is not merely an operational choice; it is an immense financial hurdle that requires access to capital and infrastructure that these businesses simply do not possess. When public agencies force these requirements into their procurement and bidding processes, they are unintentionally narrowing the field of qualified vendors. The result is a system where only the largest, most well-capitalized firms can afford to bid on government contracts. This limits healthy competition, potentially drives up costs for taxpayers, and forces out smaller, reliable service providers who play a critical role in our local economy.

The current approach lacks the transparency and broad public consultation that a permanent rulemaking process would provide. These policies have far-reaching impacts on the cost and availability of services we rely on daily, and they should not be managed through continuous stopgap measures that inadvertently disadvantage smaller businesses.

I respectfully urge the Office of Administrative Law to consider these impacts. Please encourage a transition toward a framework that avoids perpetual emergency status, allows for more stability, and ensures that the transition to new technology does not come at the expense of fair and open competition in government contracting.

Thank you for your time and for the opportunity to comment.

Sincerely,

Jason Cole