



CA·NURSES
FOR ENVIRONMENTAL HEALTH & JUSTICE



September 26, 2025

OAL Reference Attorney
300 Capitol Mall, Suite 1250
Sacramento, California 95814
Via email: staff@oal.ca.gov

Re: Emergency Amendment and Adoption of Vehicle Emissions Regulations

On behalf of the undersigned health and medical organizations, we write to express our support for the California Air Resources Board's Emergency Amendment and Adoption of Vehicle Emissions Regulations. This will clarify the guiding standards for the certification of light-, medium- and heavy-duty vehicles in the face of uncertainty created by federal and industry actions.

California has approved various low emission and zero-emission standards for all vehicle classes for decades to protect the health and safety of its residents. Currently, actions from the federal government, both Congress and US EPA, vehicle manufacturers lawsuits and other factors have created significant uncertainty in California's ability to certify vehicles for sale in the state. This emergency rule will clarify that previously adopted standards remain in place despite actions taken to undermine confidence in more recently approved Advanced Clean Cars and Heavy-Duty Low NOx Omnibus standards.

Californians continue to face the most difficult air pollution in the United States, with nearly 9 in 10 people impacted by ozone and/or particle pollution according to the American Lung Association's "State of the Air" 2025 report. The impacts of air pollution affect everyone, but especially those individuals living close to polluting sources causing asthma attacks, heart attacks and strokes and premature deaths. The transportation sector is the dominant source of California's ozone and diesel particle pollution challenges meaning that the strongest possible standards must be employed to protect the health of the public.

We support California taking action to uphold the strongest possible standards to reduce emissions from the transportation sector. Because of the uncertainty injected into emission control requirements for new vehicles, California needs to approve this emergency rulemaking and provide clarity in our vehicle certification process. We look forward to ongoing efforts to clarify and expand on California's lifesaving programs to control deadly pollution from mobile sources. Please contact Will Barrett at William.Barrett@Lung.org with any questions.

Sincerely,

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Senior Clean Air Manager
American Lung Association

Vanessa Forsythe RN MSN
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