Comments of Kia America, Inc.
to the
California Air Resources Board

RE: Second Public Workshop of the Drive Forward Light-Duty Vehicle Program

July 17, 2026

Kia America, Inc. (Kia) appreciates the opportunity to submit these comments to the California Air Resources Board (CARB) on the second public workshop for the Drive Forward Light-Duty Vehicle Program held on June 22, 2026. The success of the Drive Forward Program is critical to ensuring California's continued success in improving vehicle emissions outcomes while also acknowledging consumer and market realities that support a robust light-duty vehicle market.

Kia has invested over $750 million in California and supports more than 4,000 jobs in the state. Kia's presence in California includes our North American headquarters, design center, and regional sales office in Irvine; proving grounds in the Mojave desert; and a network of 66 dealerships across the state. Kia has also invested over $28 billion in electrified powertrains and millions more in electric vehicle (EV) charging infrastructure. By later this year, Kia will have 3 dedicated EVs for sale in California while continuing to offer more of our fuel-efficient hybrid-electric vehicles (HEVs). Kia is committed to electrification and to maintaining our successful presence in California.

Kia has summarized several thoughts and responses to areas where CARB is seeking input. We hope this feedback can help CARB shape a successful new emissions program that benefits all Californians.

Kia supports comments submitted by the Alliance for Automotive Innovation on the Drive Forward workshop.

Low-Emission Vehicles

Kia is proud of the improvements it has achieved in reducing emissions from its fleet and is continuing to deploy new technologies to realize further improvements. We appreciate

CARB's commitment to updating the Advanced Clean Cars I (ACCI) standards, which have proven successful in improving emissions from new light-duty vehicles.

However, Kia has concerns with the proposed NMOG+NOx Fleet Average Standards (FAS). Specifically, the stringency and the trajectory of the proposed FAS is unachievable given the amount of zero-emission vehicle fleet share needed. CARB is also considering standards that require meeting the same NMOG+NOx bin certification levels on additional test cycles from the current low-altitude FTP cycle. When factoring in OEM compliance margins in choosing a compliance bin, certification to 15 mg/mi for internal combustion engine vehicles (ICEs) is extremely difficult. For larger vehicles, where overall utility like payload and towing are important purchase considerations, the same holds true with a 20 mg/mi bin. Reaching an ultimate FAS target of 12 mg/mi is unachievable for ICE-vehicles, even with hybridization, and would require a significant amount of ZEVs. These targets risk turning the LEV program into a ZEV program.

Kia recommends an approach that removes ZEVs from FAS calculations, as they do not emit tailpipe NMOG+NOx. Kia also recommends setting the FAS at levels that are ambitious, yet achievable, for ICEs (including HEVs). Kia believes that an ultimate standard of 30 mg/mi for ICEs (inclusive of HEVs) would advance California's air quality goals while maintaining consumer choice and affordability and providing more predictability for manufacturers.

The proposed initial stringency of 22 mg/mi in 2031MY would require a year over year decrease of over 25% from the 2030MY standard of 30 mg/mi. This steep trajectory continues with a proposed 17 mg/mi standard just two model years later, representing nearly another 25% decrease. Altogether this proposal requires a 43.3% decrease in just three model years. These accelerated decreases are well beyond historic average industry achievements, even during model years when the ZEV sales share has accelerated. Kia is concerned that these steep decreases are unachievable in the proposed time frame and would require significantly more lead time that takes into account product lifecycles and market realities. At a minimum, we support a longer phase-in for these standards, not shorter.

Kia is supportive of differential treatment in FAS for Plug-in Hybrid Vehicles (PHEVs) and Extended-Range Electric Vehicles (EREVs). EREVs are a fundamentally different powertrain than PHEVs and therefore should be evaluated based on their unique characteristics. With a larger battery pack, greater all-electric range (AER), and an onboard generator that is decoupled from the drivetrain, EREVs will operate significantly more miles as electric-only. Since the onboard generator will be used primarily to supply electricity, it is expected to operate in more efficient ranges than ICEs under most conditions and thus achieve better emissions results when in operation. Existing procedures to handle cold-start operation adopted for plug-in hybrids should carry over to EREVs to deliver the emissions benefits CARB seeks. For these reasons, EREVs should be considered for the significant benefits they provide.

Greenhouse Gas Standards

Since California first introduced greenhouse gas (GHG) emissions standards, Kia has significantly improved its fleet efficiency. Kia is committed to increasing deployment of fuel-efficient technologies and will offer an electrified option for our entire vehicle lineup by 2029MY.

CARB has proposed to adopt new GHG standards that are nearly identical to the those promulgated by the U.S. Environmental Protection Agency (EPA) under the Biden administration. EPA's annual Trends Report[1] showed that as early as 2023MY the industry was unable to achieve the levels required in the previous, less stringent GHG standards applicable to that model year. The rapid year over year GHG reductions under previous standards meant that the prospects for the industry to return to compliance were unrealistic.

Recently, there has been little growth in sales shares of EVs, limiting EV contributions to annual decreases in emissions. At the same time, many of the ICE powertrain technologies identified in the workshop (slide 48) have already been deployed to various degrees by OEMs. Industry would need to deploy even more technology to achieve the ambitious proposed targets. CARB should take into account the significant costs and lead time required to develop and bring to market such technologies. Kia has concerns with adopting standards that are significantly more stringent than previous standards that the industry could not meet. Instead, we encourage CARB to develop new targets that better take into account the current levels of GHG emissions across the light-duty fleet, lead times to deploy technology and update products, achievable year-over-year reductions, and consumer appetite for various powertrains.

Kia supports CARB's proposal to eliminate upstream emissions factors for ZEVs, PHEVs, and EREVs. We agree with CARB that the complexity of such factors makes implementation difficult, and the emissions associated with them are already addressed by other CARB programs such as Cap and Invest and the Low Carbon Fuel Standard. Focusing on tailpipe GHG emissions, as CARB does with tailpipe criteria emissions, will help to ensure a successful program.

ZEV Minimum

Kia supports an appropriately set ZEV minimum requirement. We agree with CARB that setting such a requirement would provide the regulatory stability and market certainty needed to support continued investment in ZEVs. This would also help preserve consumer choice and market competition while advancing CARB's mission to reduce emissions. Kia believes that the minimum ZEV levels should be set to be sufficient to achieve these goals while not overly restrictive to limit consumer choice and affordability. Setting a minimum ZEV level also supports Kia's position that ZEVs should be left out of the NMOG+NOx FAS.

[1] 2024 EPA Automotive Trends Report, EPA, November 2024

In seeking to set a ZEV minimum, CARB has asked for input on numerous aspects including early compliance options, banking, trading and pooling provisions (ABT), and vehicle values. Kia has continually taken the position in many different programs that ABT provisions are a useful tool to ensure the success of a program by allowing manufacturers to limit costs and complexity in meeting any given set of standards. As such, Kia would support the use of an ABT provision in the ZEV minimum standards. Similar to the value provided by an ABT provision, early compliance options can limit costs and complexity to achieve compliance given the long lead-time and product lifecycles of vehicle models. Kia also believes that EVs should count fully as one ZEV, and that EREVs should count for at least a portion of an OEM's ZEV minimum requirement.

Conclusion

Kia remains committed to reducing emissions while maintaining consumer choice and affordability. Kia stands ready to continue working with CARB in developing its next set of light-duty vehicle emissions regulations and appreciates the opportunity to provide our feedback. Thank you for considering our comments.