July 17, 2026

California Air Resources Board
1001 I Street
Sacramento, California 95814
*Via email:* cleancars@arb.ca.gov

**RE: Comments on CARB's Drive Forward Light-Duty Vehicle Program**

The undersigned health and medical organizations offer the following comments in response to the California Air Resources Board's June 22nd Drive Forward workshop. California's ongoing air quality progress depends on CARB development and adoption of vehicle emission controls necessary to protect health.

Despite decades of progress made under local, state and federal clean air protections, Californians face the most difficult air pollution challenges in the United States. More than eight in 10 Californians live in a community impacted by unhealthy levels of ozone and/or particle pollution. Exposure to unhealthy levels of air pollution contributes to asthma attacks, heart attacks and stroke, childhood asthma onset and respiratory infections, premature deaths and other health and developmental consequences. Transportation pollution is associated with significant health impacts, which are more pronounced for those living near major roadways due to exposures to exhaust as well as road and tire particle impacts.

We support the strongest possible standards to protect health against transportation pollution and encourage earlier timeframes to maximize health benefits in the near-term. We offer the following recommendations for consideration:

**Standards for Engine Exhaust Particle Pollution** We encourage CARB to align the stringency of particle pollution standards with the stringency of the Tier 4 federal 0.05 grams per mile standards for new vehicles. This will ensure a significant reduction in engine particle pollution emissions, with widespread deployment of low-cost and highly effective gasoline particle filters being the norm. Many vehicle models are being sold internationally with GPFs and new vehicles available for sale in the US are increasingly including this technology to limit emissions of this deadly pollutant.

**Standards for Non-Engine Particle Pollution** We encourage CARB to move forward with controls for particle pollution from brake and tire wear as a growing source of concern for ambient air pollution. Establishing brake and tire wear standards for

combustion and non-combustion vehicles will help to reduce particles beyond the engine exhaust concerns noted above.

**Standards for Smog-Forming Emissions**
Smog-forming emissions from passenger vehicles must continue to be controlled through stringent, declining standards for oxides of nitrogen (NOx) and non-methane organic gases (NMOG). We support the direction of more health-protective stringency levels and new bins outlined in the public workshop and believe CARB should bring the final base year forward from the proposed 2037 end-point to bring benefits to communities sooner.

**Standards for Greenhouse Gas Emissions**
We appreciate the ongoing attention to protecting health against the damages of our changing climate. We encourage CARB to consider accelerating the timeline for proposed climate pollution standards.

**Zero Emission Vehicle Standards**
We encourage CARB to continue to focus on the need for zero-emission technologies alongside combustion vehicles. For vehicles with mixed combustion and zero-emission technologies, we support the ongoing attention to cold start, utility factors and other factors to ensure the greatest benefits from all vehicle technologies continue to support health and air quality progress.

We view the development and implementation of a strong rule as critical to the ongoing protection of Californians' health. Please contact Benjamin Lu at Benjamin.Lu@Lung.org.

Sincerely,

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