COMMENTS IN RE: CARB'S JUNE 2026 DRIVE FORWARD LIGHT-DUTY VEHICLE WORKSHOP

Submitted via CARB's Website, July 17, 2026

* * * * *

The undersigned organizations respectfully submit the following comments on the California Air Resources Board (CARB) staff's preliminary proposals for the Drive Forward Light-Duty Vehicle Program, as presented in the second public workshop held on June 22, 2026.

I. INTRODUCTION

We strongly support CARB's continued leadership in advancing clean, affordable vehicles and securing the criteria, toxic, and greenhouse gas (GHG) pollutant reductions necessary to protect public health and welfare in California and beyond. Earlier this week, the Governor signed legislation creating the MyFirstEV program, which is funded by a $135 million state investment split evenly among participating automakers who will match the state's contribution dollar-for-dollar. Thirteen automakers are participating in this pathbreaking program, which, in the coming months, will deliver Californians instant rebates of up to $3,500 on affordable new and used zero-emission vehicles (ZEVs) in the state. These clean vehicles will cut harmful air pollution, protect public health, save Californians thousands of dollars in avoided fuel and maintenance costs, and support jobs.

This important and collaborative progress creates a strong foundation for CARB's Drive Forward Light Duty Vehicle rulemaking, which, together with other mobile and stationary source efforts, is vital to achieving the necessary criteria pollutant

reductions to meet National Ambient Air Quality Standards and protect California's 39 million residents from harmful smog and soot. Simultaneously, this program is essential for achieving California's statutory 2030 and 2045 science-based climate targets and propelling GHG reductions forward. As the federal government has taken unprecedented and unlawful steps to weaken criteria pollutant standards and eliminate federal vehicle GHG standards entirely, California's continued leadership—along with its partners in the Affordable Clean Cars Coalition—is more important than ever.

We strongly encourage CARB to adopt performance-based criteria pollutant and GHG standards starting as quickly as possible and urge CARB to consider accelerating the final phase-in year to an earlier timeframe, for instance Model Year (MY) 2036. Because the proposed emissions standards provide a variety of compliance pathways and can be achieved using existing technologies, compliance on a faster timeline is both technologically feasible and cost-effective. A stronger, shorter rule would deliver cleaner air and affordable, fuel-saving vehicles on a faster timeline that would benefit Californians.

Beyond performance standards for exhaust emissions, we support CARB's efforts to develop a cohesive Drive Forward program that protects consumers and ensures real-world pollution reductions that improve public health and the environment. These provisions include demand-side solutions that empower consumers by effectively communicating the benefits of ZEV technologies to prospective purchasers. We also broadly support CARB's consideration of ZEV certification measures, including those that advance battery durability. Finally, we support CARB's efforts to ensure technologies like plug-in hybrid vehicles (PHEVs) are credited with emission reductions consistent with their real-world performance and to reduce pollution from other important sources, like new brake-wear standards to address non-exhaust particulate matter (PM) pollution from braking.

The remainder of our comment letter is focused on the proposed exhaust emissions standards. We look forward to reviewing additional elements of the proposal during the rulemaking process and offering further feedback at that time. We appreciate the transparent and robust public process that CARB has outlined, including additional workshops and opportunities for direct engagement. We strongly support CARB's vital efforts and look forward to continuing to engage with CARB and stakeholders to advance durable, effective, feasible, and protective standards.

II. PERFORMANCE-BASED EXHAUST EMISSIONS STANDARDS

A. Accelerated Phase-In of GHG and Criteria Pollutant Standards

We encourage CARB to consider strengthening its light-duty performance-based standards for non-methane organic gases and oxides of nitrogen (NMOG+NOx) and GHGs by accelerating the timeline for emission reductions. We support CARB starting the new Drive Forward standards no later than MY 2031 and urge CARB to consider accelerating the final phase-in year to an earlier timeframe—for example, ensuring standards are phased-in by 2036, rather than extending the rule through 2038, as CARB proposed in the June workshop.

Maintaining a start date that is as soon as feasible is critical to driving forward clean vehicles and pollution reductions and builds on California's important rebates for clean, affordable electric vehicles. It is also consistent with the agency's statutory authority and with other past standards and industry practices. For example, EPA previously finalized light-duty GHG standards in December 2021 for MY 2023, providing just over one full year of lead-time.[1] A review of industry past practices confirms that is a reasonable time frame for compliance: automakers frequently make swift changes to their product lines, whether in response to consumer demand, financial goals, or as required by regulatory requirements.[2] These considerations suggest that beginning the program in the MY 2031 timeframe is reasonable.

That is particularly true in this case because CARB's proposed standards can be met with existing technology. As EPA recognized when it adopted the federal Tier 4 standards—which are substantially similar in stringency to the proposed Drive Forward standards—"unlike some prior vehicle emissions standards . . . the technology necessary to achieve significantly more stringent standards has already been developed and demonstrated in production vehicles."[3] As discussed

---

[1] EPA, *Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards*, 86 Fed. Reg. 74,434 (Dec. 30, 2021) (finalizing revised GHG standards that began in MY 2023 and increased in stringency year-over-year through MY 2026).

[2] *See* Comment submitted by Environmental Defense Fund (EDF) et al., Docket No. EPA-HQ-OAR-2025-3297, Comment ID No. EPA-HQ-OAR-2025-3297-0262, at 46–49 ("NGO Tier 4 Delay Comment") (compiling examples of manufacturers quickly pivoting to meet both market and/or regulatory demands, as demonstrated by Product Life Cycle data published by the *Baum and Associates North American Automotive Production Forecast*).

[3] EPA, *Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles*, 89 Fed. Reg. 27,842, 28,086 (Apr. 18, 2024) ("EPA Tier 4 Rule").

in more detail below, there is extensive evidence in the record that manufacturers can meet the NMOG+NOx, PM, and GHG standards proposed at CARB's workshop through a range of existing technologies, including by manufacturing more internal combustion engine vehicles (ICEVs) with increased efficiency and improved aftertreatment technologies, as well as powertrain electrification.[4] And California has just adopted new, collaborative consumer rebates to help support and further accelerate clean, affordable electric vehicles, which further underscores that these measures would be feasible and cost-effective.

Ensuring the standards reach their ultimate stringency earlier, for instance by 2036, would deliver cleaner air and affordable, fuel-saving vehicles on a faster timeline that would result in substantial benefits for Californians. With California—including communities in South Coast and San Joaquin Valley—continuing to have some of the worst air quality in the nation, driving down emissions as rapidly as possible remains imperative to protect Californians' health. And with high gasoline prices, a new rule that helps ensure more clean, affordable vehicles that will save consumers thousands of dollars in fuel and maintenance costs is vital.[5]

B. NMOG+NOx Standards

We also support CARB establishing protective, performance-based NMOG+NOx standards. Because NMOG+NOx from vehicle tailpipes is a primary contributor to toxic soot and smog in California, these standards protect Californians' health and directly address California's local nonattainment issues.[6]

---

[4] *See id.* ("Manufacturers have also demonstrated impressive gains in controlling NMOG+NOx and PM from vehicles with internal combustion engines.").

[5] Coltura, *EV Cost Savings Index*, https://data.coltura.org/ev-savings-index (estimating that California drivers who travel 12,000 annual miles will save more than $1,500 per year in fuel and maintenance costs, based on the average prices during the week of July 6, 2026).

[6] *See, e.g.*, South Coast Air Quality Management District, 2022 Air Quality Management Plan, at 4-7 (Dec. 2, 2022), *available at* https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=edcebd61_16 (concluding that mobile source controls must be a "significant part" of the strategy to address non-attainment in the South Coast region because "[m]obile sources will account for about 80 percent of regional NOx emissions in 2037, or around 240 percent of the carrying capacity").

1. Light-Duty Vehicle NMOG+NOx Standards

CARB's proposed 12 mg/mi light-duty NMOG+NOx standards can be met by advanced gasoline vehicle aftertreatment technologies. In 2024, EPA reviewed a suite of already-existing ICE-based NMOG+NOx control technologies that manufacturers could employ, either individually or in combination.[7] That analysis demonstrated that EPA's protective NMOG+NOx standards—15 mg/mi by MY 2032—were feasible by relying on gasoline vehicle aftertreatment technologies alone. Before adopting the federal Tier 4 rule, EPA identified thirty-nine MY 2023 ICE vehicle models with NMOG+NOx emissions certified below 15 mg/mile on the Federal Test Procedure (FTP), four models at or below 10 mg/mile, and an additional sixty models certified between 15 and 20 mg/mile.[8]

New certification data since EPA promulgated the Tier 4 rule reinforces the conclusion that manufacturers can achieve the proposed Drive Forward NMOG+NOx standards by incorporating new technologies on ICEVs. An EDF analysis of the certification data for MY 2025–26 light-duty vehicles produced by the ten largest original equipment manufacturers (OEMs) underscores the feasibility of complying with the NMOG+NOx standards with ICEVs.[9] Almost a quarter (23.9%) of MY 2026 models certified at or below 15 mg/mi, up from 15.8% for MY 2025.[10] Additionally, for MY 2026, more than half (52.6%) of all models certified at or below 20 mg/mi, which exceeds the proposed Drive Forward fleetwide average standard of 22 mg/mi for MY 2031.[11] And 85.5% of all models certified at or below 40 mg/mi—with fewer higher emitting models that need to be balanced in the fleetwide averaging, OEMs are well-positioned to meet the proposed Drive Forward standards.[12] Notably, low NMOG+NOx emissions are not limited to lighter vehicles with smaller engine sizes: for MY 2026 vehicles with

---

[7] *See* EPA, *Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles: Regulatory Impact Analysis*, EPA-420-R-24-004, at 3-56–3-64 (Mar. 2024), *available at* https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1019VPM.pdf ("EPA Tier 4 Rule RIA") (reviewing "[m]ultiple technologies and control strategies [that] are available to reduce tailpipe emissions from ICE"); NGO Tier 4 Delay Comment, at 36 (summarizing available technologies to reduce NMOG+NOx emissions from ICEVs).

[8] Tier 4 Rule RIA, at 3-53.

[9] *See* NGO Tier 4 Delay Comment, Appendix 2, at 118–24 (explaining EDF's methodology and findings).

[10] *Id.*, Appendix 2, at 120.

[11] *Id.*

[12] *Id.*

an engine displacement between 5 to 6 liters, 64% of all models certified at or below 15 mg/mi.[13]

Viewed as a whole, the evidence shows that a variety of manufacturers and vehicle models are already approaching or exceeding the emission levels that CARB is proposing to require years down the road. This reaffirms not only that the technology is readily available to meet the standards proposed by CARB, but also that manufacturers can achieve those emission reductions on an expeditious timeline at a reasonable cost. EPA's own analysis confirms that, for less than $100, incremental adjustments to precious metal loadings in existing three-way catalytic converter formulations would be sufficient to reduce emissions by nearly 25% and bring vehicles into compliance with the initial years of the federal Tier 4 standards.[14] And increased precious metal loading is just one of the many cost-effective techniques available to manufacturers to reduce NMOG+NOx emissions.

As explained by the Manufacturers of Emission Controls Association (MECA), automakers are employing a wide variety of strategies to comply with lower NMOG+NOx emissions standards.[15] Design changes to system architecture can manage engine-out emissions and exhaust flows, reduce catalyst light-off times, increase exhaust temperatures during low-load and idle periods, and prevent deterioration of engine and emission control components by reducing excess warmed-up and hot running emissions. Recent technological advances in substrate construction and catalyst coating technology have lowered the cost of

---

[13] *Id.*, Appendix 2, at 121.

[14] EPA, *Revision of Tier 4 Criteria Pollutant Standards, Part 1: Amendments to Phase-In Schedule for Light-Duty and Medium-Duty Vehicles: Draft Regulatory Impact Analysis*, EPA-420-D-26-001, at 1-5–1-6, tbl.1-3 (May 2026), *available at* https://www.epa.gov/system/files/documents/2026-05/420d26001.pdf ("EPA Tier 4 Delay DRIA").

[15] *See* Comment submitted by Manufacturers of Emission Controls Ass'n, Docket No. EPA-HQ-OAR-2025-3297, Comment ID No. EPA-HQ-OAR-2025-3297-0179, at 10–12 ("MECA Tier 4 Delay Comment") (reviewing advanced technologies and emission control strategies that manufacturers are integrating into vehicles to achieve more stringent NMOG+NOx emission standards); *see also* California Air Resources Board, Response to Proposed Revision of Tier 4 Criteria Pollutant Standards, Docket No. EPA-HQ-OAR-2025-3297, Comment ID No. EPA-HQ-OAR-2025-3297-0177, at 8–10 ("CARB Tier 4 Delay Response") (summarizing research and EPA analysis regarding technologies to reduce NMOG+NOx emissions from ICEVs).

catalysts by reducing the need for precious metals. Thus, MECA estimates that the cost of bringing a Bin 30 vehicle to Bin 15 would be less than $100 per vehicle.[16]

Another key finding from EPA's 2024 analysis was that certain implementations on hybrid electric vehicles demonstrated less than 5 mg/mi NMOG+NOx over the 25°C FTP cycle.[17] Due to their high voltage electrical systems, powerful motors, and large batteries (as compared to non-hybrid vehicles), hybrid vehicles are well-suited to incorporate highly cost-effective technologies that further reduce engine-out and tailpipe NMOG+NOx emissions beyond levels currently demonstrated in the market.[18] Given the increasing production and popularity of hybrids,[19] CARB's light-duty NMOG+NOx standards should account for those potential emissions reductions.

2. Medium-Duty Vehicle NMOG+NOx Standards

Furthermore, we support CARB's development of more protective standards for Class 2b and 3 Medium-Duty Vehicles (MDV). CARB proposes to reduce the MDV NMOG+NOx standard to 100 mg/mi by MY 2033. This represents a significant advancement in stringency from the existing standards, though it does not reflect further emission reductions beyond 2033. Accordingly, we encourage CARB to consider further strengthening this standard, particularly in the later model years of the program.

For instance, when EPA finalized the Tier 4 Rule in 2024, the agency demonstrated that the MDV fleet could achieve average NMOG+NOx emissions of 75 mg/mi by MY 2031.[20] An EDF review of certification data for MY 2024–26 demonstrates that some internal combustion engine vehicles already test or certify below that EPA standard: there are nine Class 2b and two Class 3 test groups that tested at or below

---

[16] MECA Tier 4 Delay Comment, at 12.

[17] CARB Tier 4 Delay Response, at 10.

[18] *See* Comment submitted by Attorneys General of California, et al., Docket No. EPA-HQ-OAR-2025-3297, Comment ID No. EPA-HQ-OAR-2025-3297-0177, at 44–45 ("Multi-State Tier 4 Delay Comment").

[19] *See* Comment submitted by Kenneth Gillingham and Alan Jenn, Docket No. EPA-HQ-OAR-2025-3297, Comment ID No. EPA-HQ-OAR-2025-3297-0177, at 9–10 ("Gillingham-Jenn Tier 4 Delay Comment") (noting that hybrid models reached nearly 20 percent of new vehicle sales by the end of 2025, and that the only powertrain that showed sales gains in April 2026 was conventional hybrids).

[20] 89 Fed. Reg. at 27,857.

75 mg/mi, including four test groups that tested at or below 30 mg/mi.[21] And there are four Class 2b test groups that certified below 75 mg/mi and two that certified below 30 mg/mi.[22] We recommend that CARB consider further strengthening the MDV NMOG+NOx standards based on the certification data and opportunities for further technological development over the timeframe of the rule.

C. GHG Standards

We strongly support CARB's proposed adoption of performance-based GHG standards that allow vehicle technologies to qualify for credits based on their real-world emissions performance and permit averaging across technologies. We also support CARB's reexamination of the footprint-based curves, so as to incentivize manufacturers to comply through the deployment of advanced emissions control technologies.

CARB should also seek to reinforce affordability through its standards, building on California's important progress on point-of-sale rebates reflected in the MyFirstEV program. For instance, clean and affordable electric vehicles produce no pollution from their tailpipes and have far lower operating costs than gas cars.[23] By adopting protective, performance-based GHG standards, CARB can help ensure access to new, cleaner vehicles that capitalize on the increasing affordability of emissions reductions, regardless of powertrain.

We also encourage CARB to consider the latest information on the costs of GHG improvements, particularly declining costs for electric vehicles. Manufacturers are rapidly advancing their electric vehicle technologies and can realize further cost savings through falling battery costs, alternative battery chemistries, and improvements to other vehicle components, such as power electronics, motors, e-axles, onboard chargers, and other emerging technologies.[24] Battery costs

---

[21] Comment submitted by Environmental Defense Fund (EDF), Docket No. EPA-HQ-OAR-2025-0194, Comment ID No. EPA-HQ-OAR-2025-0194-3046, at 59 ("EDF Technical Comments on Endangerment Finding").

[22] *Id.*

[23] *See* EPA Tier 4 RIA, at 4-33, 4-47–4-54 (reviewing data showing that BEV owners save on fuel, maintenance, and repair costs).

[24] *See* Vishnu Nair, Himanshu Saxena, and Sajit Pillai, *Alternative Powertrain Pathways for Light-Duty and Class 3 Vehicles for MYs 2024, 2027, and 2035 to Meet Future CO2 Emission Targets*, Roush (June 2023) (attached as Exhibit) (examining the technology, cost, and efficiency of alternative powertrains for light-duty and Class 3 vehicles).

represent the single largest component cost for battery electric vehicles (BEVs). Updated data and projections, including by BloombergNEF and Goldman Sachs, show declining cost projections.[25] Moreover, recent developments have shown significant advancements in battery technology—such as development of lithium manganese-rich batteries by some manufacturers —many of which are expected to increase range and reduce prices.[26] One recent technical analysis incorporated the latest battery cost information and concluded that BEVs will reach cost parity with comparable ICEVs over the next five years.[27] CARB should consider those lower, updated battery cost projections when developing the final Drive Forward proposal to better reflect the current and projected state of the market.

Advancements in cost-effective emissions reductions are not limited to battery electric vehicles and, in many cases, can be applied to vehicles with internal combustion engines. As EPA and CARB have recognized for decades, there are a diverse array of GHG control technologies for light-duty vehicles, including advanced ICEV technologies (such as low-rolling resistance tires, improved aerodynamics, lightweighting, and improved engine technologies); switching internal combustion engines to alternative fuels; and powertrain electrification, which encompasses mild hybrids, strong hybrids, plug-in hybrid electric vehicles, extended-range electric vehicles,[28] battery electric vehicles, and fuel cell electric vehicles.[29]

---

[25] *See, e.g.*, Sawyer D. Stone, Noah Heck, and Christopher Irwin, *Battery Cost Projections – Midterm Report*, Roush, at 12 (Sept. 2025) (attached as Exhibit) (projecting battery costs of $67–70/kWh for current chemistries in 2030); BloombergNEF, *Electric Vehicle Outlook 2025*, at 132–33, t.193 https://about.bnef.com/insights/clean-transport/electric-vehicle-outlook (projecting lithium-ion battery pack prices of $69/kWh in 2030); Goldman Sachs, *Electric vehicle battery prices are expected to fall almost 50% by 2026* (Oct. 7, 2024), https://www.goldmansachs.com/insights/articles/electric-vehicle-battery-prices-are-expected-to-fall-almost-50-percent-by-2025 (forecasting that battery prices will fall to $64/kWh by 2030).

[26] *See* EDF Technical Comment on Endangerment Finding, at 49–50 (reviewing publicly available announcements of manufacturer plans).

[27] Gillingham-Jenn Tier 4 Delay Comment, at 11–13.

[28] According to a Roush study on the cost and efficiency of a mid-sized SUV EREV, EREVs are cost-competitive with BEVs and PHEVs, providing manufacturers and consumers with another viable technology option for cleaner vehicles. Noah R. Heck, Vishnu R. Nair, Sawyer D. Stone, and Christopher Irwin, *2032 EREV Compact SUVs: Purchase Price, Efficiency, and Market Viability*, Roush (Sept. 2025) (attached as Exhibit).

[29] EDF Technical Comments on Endangerment Finding, at 42.

In sum, as manufacturers make technical advancements, vehicles with reduced GHG emissions are not only more cost-effective for consumers over the long-term, but they are also increasingly cost-competitive at the time of purchase. CARB should adopt protective performance-based GHG standards that reflect the latest information related to the costs of these pollution-reducing technologies and that help support clean and affordable vehicles.

D. Particulate Matter Standards

We support CARB's proposal to adopt a PM standard of 0.5 mg/mi beginning in MY 2031, which would be aligned with the EPA Tier 4 standards. By establishing this benchmark, CARB would help ensure the adoption of gasoline particulate filter technology (GPF), which EPA has described as "both mature and cost effective." [30]

Since 2013, an estimated 100 million GPFs have been installed in light-duty vehicles worldwide as a result of commonsense PM standards in other markets, including Europe, India, and China.[31] Several manufacturers currently assemble vehicles equipped with GPF in the U.S. for export to other countries.[32] In fact, a number of manufacturers are manufacturing two versions of the same model vehicles in the United States: one for export to other nations with a GPF installed, and another—of the same model—without the GPF, for sale domestically.[33]

Although GPF use is more common in other markets, a number of manufacturers are also selling certain vehicle models equipped with GPFs in the U.S., and certification data demonstrates rapidly growing GPF deployment in the U.S. market. EDF analyzed CARB's New Vehicle and Engine Certification program data, which includes information on emission control technologies for each model, and found that the number of certified vehicle models in California with GPFs grew from 41 in MY 2024 to 152 in MY 2026.[34] Only 183 of the expected 1,500 models for MY 2027 have been certified in California so far, but already 43 of them

[30] 89 Fed. Reg. at 27,944.

[31] *Id.* at 27,940.

[32] *Id.* at 27,944.

[33] MECA, *MECA GPF Coverage Results*, at 3 (June 2026) (attached as Exhibit).

[34] NGO Tier 4 Delay Comment, Appendix 2, at 128–29.

contain GPFs.[35] Nationwide, MECA stated that it expects automakers to expand their offering of models with GPFs in both MY 2027 and MY 2028.[36]

Broadly deploying this life-saving technology through the Drive Forward program would deliver substantial health benefits for Californians.[37] GPFs typically reduce PM emissions by over 95 percent,[38] and those emissions reductions meaningfully affect health outcomes: Recent analysis found that delaying implementation of the federal 0.5 mg/mi PM standard by two years would result in more than 300 tons of excess PM2.5 emissions in California by 2040,[39] leading to increased illness, hospitalizations, and mortality, with an approximate statewide health cost of $747 million.[40]

GPF technology delivers these vital health benefits at very low cost. EPA recently estimated that the cost of a GPF would range from $119 to $372 per vehicle.[41] In that analysis, however, EPA used a flawed formula that used incorrect units for the variable costs and mistakenly swapped the variable and fixed costs.[42] Correcting for those errors results in a per-vehicle cost range of $110 to $211 per vehicle.[43] That corrected estimate is consistent with other independent studies that found similarly low costs. A MECA industry assessment found that GPFs would cost approximately $50–$300 per vehicle, depending on engine displacement and technology implementation strategy.[44] The International Council on Clean Transportation (ICCT) studied the incremental direct cost of GPFs in 2011 and again in 2023, finding similar costs adjusted for inflation: ICCT's 2023 estimate was $87–$261 per vehicle.[45] Notably, all of those analyses—including EPA's flawed

---

[35] *Id.*, Appendix 2, at 129.

[36] MECA Tier 4 Delay Comment, at 8.

[37] 89 Fed. Reg. at 27,941.

[38] *Id.* at 27,942.

[39] CARB Tier 4 Delay Response, at 19, tbl.3 (summarizing increased emissions of exhaust PM2.5 in California due to EPA's proposed delay of the federal Tier 4 standards).

[40] *See id.* at 24–27 (analyzing the health disbenefits from EPA's proposed delay of the federal Tier 4 standards).

[41] EPA Tier 4 Delay DRIA, at 1-8, tbl.1-5.

[42] NGO Tier 4 Delay Comment, at 51–52.

[43] *Id.* at 52.

[44] MECA Tier 4 Delay Comment, at 8.

[45] ICCT, *Fact Sheet: What EPA's new multi-pollutant emissions proposal means for PM emissions and GPFs* (Nov. 2023), https://theicct.org/wp-content/uploads/2023/11/ID-48-

overestimate—agree that the costs of installing GPFs on ICEVs will not reach 1% of the vehicle price.[46] The magnitude of those modest compliance costs is far outweighed by the significant health benefits that will result from the reduction in excess PM emissions.

III. CONCLUSION

We thank CARB for its leadership in driving forward clean transportation. We respectfully urge CARB to move forward with a rule that is durable, effective, feasible, and protective of public health and the environment. We look forward to continued engagement on these vital issues. If you have questions or would like to discuss these comments, please contact Ryland Li at ryli@edf.org.

Respectfully,

Tom Callahan
Ryland Shengzhi Li
Peter Zalzal
Katelyn Roedner Sutter
Environmental Defense Fund

Kathy Harris
Annabelle Davis
Natural Resources Defense Council

Barbara Weber
Moms Clean Air Force

%E2%80%93-U.S.-GPF-fact-sheet-letter-70112-v3.pdf; R. Minjares & F. Posada Sanchez, *Estimated cost of gasoline particulate filters*, International Council on Clean Transportation (2011), https://theicct.org/publication/estimated-cost-of-gasoline-particulate-filters/.

[46] NGO Tier 4 Delay Comment, at 49–50.