THE INTERNATIONAL COUNCIL ON CLEAN TRANSPORTATION

17 July 2026
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: International Council on Clean Transportation (ICCT) comments on CARB Drive Forward Light-duty Vehicle Program - June 2026 Workshop

The International Council on Clean Transportation (ICCT) respectfully submits these comments on the California Air Resources Board's (CARB) Drive Forward Light-duty Vehicle Program - June 2026 Workshop.

The ICCT is an independent nonprofit organization founded to provide unbiased research and technical analysis to governments in major vehicle markets around the world. Our mission is to improve the environmental performance and energy efficiency of road, marine, and air transportation to benefit public health and mitigate climate change. Our work supports the development and implementation of advanced vehicle regulations in the world's largest markets. In the United States, the ICCT has been highly engaged with federal and state-level vehicle regulations, participating in expert working groups, submitting public comments on regulations' technical designs, and regularly publishing research on vehicle regulations and standards.

The ICCT commends the California Air Resources Board on its continuing effort to reduce passenger vehicle emissions and to support the state's growing market of advanced technology vehicles. We welcome the opportunity to provide comments on CARB's Drive Forward Light-duty Vehicle Program Junne 2026 Workshop. Our comments are as follows:

First, the ICCT strongly supports CARB's Drive Forward Light-duty Vehicle regulatory development. California's new vehicle regulations are critical to achieving the pace and scale of needed transportation emission reductions in California. Continued and strengthened standards are important to protect public health, deliver on the state's air quality and climate change obligations, expand consumer choice, and deliver substantial economic benefits to Californians and beyond. Many other jurisdictions have historically followed California's leadership on automotive emissions regulations for many years, together representing about 35% of national new light-duty vehicle sales. It is likely that many other states will continue to follow California's leadership and adopt the Drive Forward program to replicate the emissions reductions, health, and economic benefits in their own states.

Second, the ICCT believes the preliminary staff proposals for NMOG+NOx fleet average standards, PM standards, and GHG stringency are achievable, feasible, and cost-effective. The preliminary light-duty staff proposals of 12 mg/mi NMOG + NOx Fleet Average in MY 2038, 0.5 mg/mi per-vehicle PM in MY 2031, and 80 gCO_2/mi in MY 2038 are approximately aligned with the emissions stringency of EPA's Final 2024 Multi-Pollutant rule in MY 2031, but with a significant delay. Upon finalization of EPA's 2024 rule, EPA's comprehensive technical analysis and the independent technical analyses by ICCT and many other groups found EPAs standards to be appropriate, achievable, and deliver major net emissions reductions, health, climate, and economic benefits to Americans and America. The availability of advanced combustion and zero-emission vehicle technologies and the rapidly growing market share of advanced combustion and zero-emission technologies through mid-2026 reinforce that the emissions

stringency in EPA's Final 2024 rule and therefore the stringency in CARB's preliminary staff proposals, are appropriate and well within reach.

Specifically, ICCT's July 2026 public comments to EPA in response to the agency's proposed Revision of Tier 4 Criteria Pollutant Standards, Part 1, detail how the latest U.S. vehicle certification and market data show that automakers are positioned to comply with EPAs Tier 4 NMOG+NOx and PM standards for all model years, which are relevant to CARB's preliminary staff proposal.[1] Our analysis shows that automakers for years have already had access to the technology required to meet Tier 4 standards each year, including out to 2030 and beyond, and are already achieving and certifying about 150 combustion vehicle models in MY 2025 to Bin 20 and Bin 30 certification emissions levels, two years before the Tier 4 rules phase-in in MY 2027. The certification data also shows that dozens of new models have achieved measured FTP-cycle certification values that are substantially lower than the emission limit of the Bins they are certified to. Furthermore, EPA overestimated the costs of emission control technologies and underestimated the availability of these technologies and the ability for U.S. automakers to deploy them. EPA also underestimated the deployment and emission reduction potential of advanced technologies, including hybrids, plug-in hybrid electric vehicles, and battery electric vehicles. Based on recent automaker announcements, underlying economics, and market trends, conventional hybrid and battery-electric vehicle market shares are likely to be higher than EPA assumed. This means that if EPA updated its analysis to more accurately estimate the increasing market share of these advanced technologies, EPA would find that the standards are even more achievable, feasible, and cost-effective than they already are with primarily conventional vehicles. These findings are relevant to CARB's preliminary staff proposal for emissions standards and ICCT recommends CARB consider this evidence in its proposal.

Third, the ICCT recommends CARB staff consider a shorter phase-in of the NMOG+NOx and GHG fleet average standards. Specifically, ICCT recommends moving up the preliminary proposed LDV NMOG+NOx standard of 0.012 g/mi by at least two years, by no later than 2036. ICCT also recommends moving up the preliminary proposed LDV GHG standard of 80 gCO_2/mi by at least two years, by no later than 2036. These recommendations are based on the ample evidence by CARB, EPA, and independent analysis that these levels of emission reductions are feasible, achievable, and highly cost effective. Delaying their implementation would delay the emission reductions, associated health and climate benefits, and economic benefits associated with these preliminary proposed standards.

Fourth, the ICCT recommends that CARB staff consider making public additional data on the vehicle technologies, costs, emission reductions, and market penetration that underpin CARB's preliminary proposed standards. Doing so would allow for more detailed and up-to-date analysis and public input on regulatory feasibility and net benefits.

The ICCT has published several technical analyses on electric, hybrid, and conventional vehicle technology, cost, and environmental performance that are relevant to CARB's Drive Forward Light-duty Vehicle Program - June 2026 Workshop. An initial list is as follows:

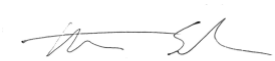
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[1] ICCT comments on EPA Tier 4 Delay. (2026). ICCT. https://theicct.org/icct-comments-on-epa-proposed-revision-tier-4-criteria-pollutant-standards-part-1-amendments-to-phase-in-schedule-for-light-duty-and-medium-duty-vehicles/

- Assessment of light-duty electric vehicle costs and consumer benefits in the United States in the 2022-2035 time frame[2]
- Hybrid vehicle technology developments and opportunities in the 2025-2035 time frame[3]
- What EPA's new multi-pollutant emissions proposal means for PM emissions and GPFs[4]
- ICCT comments on EPA Tier 4 Delay[5]
- ICCT comments on EPA proposed reconsideration of 2009 Endangerment finding and greenhouse gas vehicle standards[6]
- ICCT comments on NHTSA proposed rule, "The safer affordable fuel-efficient (SAFE) vehicles rule III for model years 2022 to 2031 passenger cars and light trucks"[7]

We would be glad to clarify or elaborate on any points. CARB staff can feel free to contact our U.S. Program Director, Pete Slowik (peter.slowik@theicct.org) with any questions.

Sincerely,



Stephanie Searle, PhD
Senior Director of Programs
International Council on Clean Transportation (ICCT)

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2 Slowik, P., Isenstadt, A., Pierce, L., and Searle, S. (2022). Assessment of light-duty electric vehicle costs and consumer benefits in the United States in the 2022-2035 time frame. ICCT. https://theicct.org/publication/ev-cost-benefits-2035-oct22/

3 Isenstadt, I., and Slowik, P. (2025). Hybrid vehicle technology developments and opportunities in the 2025-2035 time frame. ICCT. https://theicct.org/publication/hybrid-vehicle-technology-developments-and-opportunities-in-the-2025-2035-time-frame-feb25/

4 Isenstadt, A. (2023). What EPA's new multi-pollutant emissions proposal means for PM emissions and GPFs. ICCT. https://theicct.org/publication/fs-epas-multi-pollutant-emissions-proposal-nov23/

5 ICCT comments on EPA Tier 4 Delay. (2026). ICCT. https://theicct.org/icct-comments-on-epa-proposed-revision-tier-4-criteria-pollutant-standards-part-1-amendments-to-phase-in-schedule-for-light-duty-and-medium-duty-vehicles/

6 ICCT comments on EPA proposed reconsideration of 2009 Endangerment finding and greenhouse gas vehicle standards. (2025). ICCT. https://theicct.org/icct-comments-on-epa-propos-sep25ed-reconsideration-of-2009-endangerment-finding-and-greenhouse-gas-vehicle-standards/

7 ICCT comments on NHTSA proposed rule, "The safer affordable fuel-efficient (SAFE) vehicles rule III for model years 2022 to 2031 passenger cars and light trucks. (2026). ICCT. https://theicct.org/icct-comments-on-nhtsa-proposed-rule-the-safer-affordable-fuel-efficient-safe-vehicles-rule-iii-for-model-years-2022-to-2031-passenger-cars-and-light-trucks/