

November 21, 2025

Ms. Shobna Sahni  
Ms. Belinda Chen  
Ms. Anna Wong  
Ms. Natalie Reavey  
Mr. Yong Yu

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814-2828

**Re: Auto Innovators' Comments on the Public Workshop for the Drive Forward Light-Duty Vehicle Program**

Dear Ms. Sahni, Ms. Chen, Ms. Wong, Ms. Reavey, and Mr. Yu,

Thank you for hosting the Drive Forward Light-Duty Vehicle Program (Drive Forward) workshop and for providing an opportunity to comment on the California Air Resources Board's (CARB) presentation.

The Alliance for Automotive Innovation (Auto Innovators) represents the full auto industry value chain, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector<sup>1</sup>.

First, we deeply appreciate CARB's desire to make any potential rule flexible and cost-effective<sup>2</sup>. Flexibility is instrumental to companies' ability to choose the most innovative, consumer friendly, compliance pathway that best supports their ongoing development of new vehicle models. Affordability has been a major focus for Governor Newsom and the Legislature this year; this is also the case for the auto industry based on feedback from consumers. Therefore, cost-effectiveness is also a top priority for automakers to offer a wide range of vehicle technologies that are accessible to consumers of all backgrounds. We look forward to providing technical guidance that can protect affordability and consumer choice while advancing California's environmental goals.

Second, while we understand this rulemaking is early stage, we would like to better understand Drive Forward's overarching goals and timeline. Previous CARB regulations have had clear themes on specific outcomes, such as environmental goals and the development of the future car market. We would like to ensure Drive Forward operates similarly, which will help guide our feedback to CARB.

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<sup>1</sup> Alliance for Automotive Innovation. (n.d.). *Resources and insights*. <https://www.autosinnovate.org/resources/insights>

<sup>2</sup> Air Resources Board. Drive Forward Light-Duty Vehicle Program. First Public Workshop. October 21, 2025. Slide 11. <[https://www2.arb.ca.gov/sites/default/files/2025-10/2025\\_10\\_21\\_Workshop\\_Presentation\\_for\\_ADA\\_V5.pdf](https://www2.arb.ca.gov/sites/default/files/2025-10/2025_10_21_Workshop_Presentation_for_ADA_V5.pdf)>

Furthermore, staff proposed an extensive list of potential regulatory tools<sup>3</sup>, any of which could be significant to the development of vehicle model years 2031 and later. We are compiling technical questions with our members to better understand how these concepts might work in practice and look forward to discussing staff's vision.

CARB staff are consistently accessible and very engaged with Auto Innovators, our members, and other stakeholders. This spirit has been essential to enabling an open dialogue and collaboration between CARB and the industry. We thank staff for this approach and hope to continue this partnership as we provide technical guidance and feedback throughout the Drive Forward process.

If you have any further questions, please contact me at [cbullis@autosinnovate.org](mailto:cbullis@autosinnovate.org).

Respectfully submitted,

Cory Bullis  
Director, Energy & Environment Policy  
Alliance for Automotive Innovation

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<sup>3</sup> Id., at Slide 12.