

November 21, 2025

California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on the Drive Forward Light-duty Vehicle Program

Dear Chair Sanchez and Members of the Board,

The California New Car Dealers Association (CNCDA) is a statewide trade association representing the interests of over 1,300 franchised new car and truck dealer members. CNCDA members primarily engage in the sale and lease of new and used motor vehicles and provide customers with parts, service, and automotive repair.

California's new car dealers are committed to supporting the state's transition to zero-emission vehicles (ZEVs) and cleaner combustion technologies. Dealers are at the forefront of the ZEV transition, ready to help consumers navigate purchasing ZEVs and cleaner technologies that meet their transportation needs.

Our front-line experience has shown us that the ZEV transition is possible but must be undertaken in a way that aligns with consumer demand and the state's charging infrastructure. A rule that does not adequately consider these factors will result in unintended negative consequences. For example, if there is inadequate consumer demand for or availability of ZEVs, automakers may "comply" by reducing the sale of new internal combustion vehicles. This increases vehicle costs, decreases the sale of cleaner new vehicles, and pushes Californians to acquire noncompliant used vehicles from out-of-state.

These adverse consequences are not theoretical. In prior letters and meetings with CARB, we've demonstrated how CARB's Advanced Clean Trucks (ACT) and Omnibus NOx (NOx) rules resulted in an acute shortage of new trucks in California in 2024. We articulated similar fears with respect to Advanced Clean Cars II to various policymakers in early 2025, as automakers were informing dealers that they could expect increasingly dramatic reductions in vehicle supply beginning in 2026.

Considering these real concerns, it is imperative that CARB listens to all stakeholders when designing future rules. We ask CARB to consider the following:

1. Focus on total emissions, not ZEV sales ratios. The ZEV sales ratios in ACC II were arbitrary. They treated every ZEV as "good" and every internal combustion and traditional

hybrid vehicle as “bad.” The rule spurred automakers to develop heavy, large, and expensive EVs like the \$100,000 Tesla Cybertruck, and it would have banned vehicles like the \$30,000 Toyota Prius. Also, automakers faced with a mandate to sell an arbitrary percentage of ZEVs can “comply” with ZEV sales ratios by not allocating to California internal combustion and traditional hybrid vehicles. A shortage of new vehicles has many adverse consequences. It inflates the prices of used vehicles, pushes people to purchase noncompliant vehicles from out of state, increases the average age of vehicles on the road, and delays the retirement of the oldest and most polluting vehicles. Any future rule must be more thoughtful and address these adverse consequences.

2. Consider fuel efficient traditional hybrid vehicles. Demand in California for traditional gasoline-electric hybrid vehicles is very high. Many automakers are offering an increasing number of such vehicles, which offer significant environmental benefits. Hybrid variants of popular vehicles like the Honda CR-V see substantial fuel economy increases, when compared to their internal combustion engine vehicle variants. And other popular vehicles, such as the Toyota Camry, are only offered as hybrids. Many Californians (particularly those who do not have access to home charging or who are sensitive to the state’s high cost of electricity) are not yet willing or able to use an EV and the climate benefits of replacing an older 28 mpg sedan with a 50 mpg hybrid are significant. A future rule should consider the environmental benefits of hybrids and not treat them the same as ordinary internal combustion vehicles.
3. Rules must align with consumer demand. A lack of choice in the new vehicle marketplace will result in increased used vehicle sales and older vehicles on the road. The average age of cars on the road is over 14 years. A rule banning the sale of new gas cars would likely increase the value of used internal combustion vehicles and push consumers to purchase vehicles from out-of-state, as many Californians remain unwilling to fully transition to electric vehicles. The reasons for this hesitation vary. Many Californians lack access to home charging, and public charging is expensive and less convenient than filling up a gas vehicle. Other Californians see savings with hybrid vehicles due to the high and ever-increasing cost of electricity in California. Any future rule should consider the needs of all Californians, as a failure to do so will result in adverse economic and environmental consequences.
4. ZEV sales targets must not outpace the state’s EV infrastructure. California was not on track to build the EV charging infrastructure necessary to facilitate the ZEV transition envisioned by ACC II. The Energy Commission estimated that the state would need 1.2 million chargers by 2030.¹ As of September 2025, the state has roughly 200,000

¹ California Energy Commission (July 14, 2021) *Assembly Bill 2127 Electric Vehicle Charging Infrastructure Assessment: Analyzing Charging Needs to Support Zero-Emission Vehicles in 2030*. Available at: <https://www.energy.ca.gov/publications/2020/assembly-bill-2127-electric-vehicle-charging-infrastructure-assessment-analyzing>

chargers.² At current production rate of roughly 50,000 per year, California will have less than half the needed chargers by 2030. This would have been a disaster for California drivers, as it would leave drivers facing long waits and congested stations throughout the state.

5. Consult California dealers, not just automakers. As noted above, manufacturer compliance strategies on ACT and NOx demonstrate that multinational automakers may prioritize their global business needs above California customers. California dealers provide unique and invaluable insight into the local marketplace that is critical for CARB to consider.

Thank you for the opportunity to provide these comments. CNCDA stands ready to work with CARB and other stakeholders to ensure the successful implementation of any future rules impacting vehicle emissions. California can reduce vehicle emissions while preserving needed consumer choice.

Should you have any questions or comments about this letter, please do not hesitate to contact me.

Sincerely,



Anthony Bento
Chief Legal Officer
California New Car Dealers Association

² California Energy Commission (Sept. 24, 2025) *California Exceeds 200,000 Electric Vehicle Chargers*. Available at: <https://www.energy.ca.gov/news/2025-09/california-exceeds-200000-electric-vehicle-chargers>