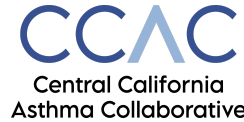


COMMUNITIES for a
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TRANSFORM



May 26, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814
[By web portal](#)

Re: Item 26-3-2: Reject the 15-Day Changes to the Cap-and-Invest Regulation

Dear Chair Sanchez and members of the California Air Resources Board:

The undersigned environmental justice, environmental, labor, housing, and transit organizations write to urge you to reject the proposed 15-Day Changes to the Cap-and-Invest Regulation. The undersigned organizations have submitted numerous comment letters concerning this matter. These letters outline a shared concern that the MDI has substantial effects on the emission reduction capability of the program and guts funding for frontline communities and essential climate programs. In short, the proposed changes:

- Hinders emission reduction strategies for major sources of the pollution;
- Creates instability in the revenue generation and “invest” arm of the program, affecting programs that further Californian’s priorities on local clean air, water, housing, transit, and forest resilience;
- Reduces the affordability benefits of the program;
- Undermines transparency, fair public participation in the decision-making process;
- Violates environmental justice and equity principles in terms of both content and process;
- Negates Governor Newsom’s promises to the equity community, his climate leadership and integrity of the program; and
- Interferes with California’s progress to protect vulnerable communities.

CARB must deliver cost-effective emissions reductions aligned with California’s climate targets. These changes do not do this. CARB must correct course, to do so we ask that CARB:

- Reject the 15-day changes proposed by the staff and ask staff to create a revised proposal that keeps the integrity of the program intact; and
- Postpone the decision on this important environmental and social justice issue to a later Board Hearing to allow for full engagement of the public and various stakeholders.

Delivering programmatic changes at a later date will not prevent the Public Utilities Commission from its current phase of the California Climate Credit proceeding which is scheduled to wrap up this Winter. In fact, eliminating the MDI, is likely to result in a higher, more steady Climate Credit. A delay in adopting programmatic changes will also not hinder CARB’s ability to continue the program under current regulations, including exploring linkage with other jurisdictions.

With three years until we are expected to hit the 2030 climate targets, and with affordability concerns at the front of everyone’s mind, California must get this right. Please take the time to ensure these program changes will meet our state’s goals and commitments.

Sincerely,

Bahram Fazeli
 Lauren Gallagher
 Communities for a Better Environment

Ana Gonzalez
 Center for Community Action and Environmental Justice

Marie Choi
 Asian Pacific Environmental Network (APEN)

Catherine Garoupa
 Central Valley Air Quality Coalition

Maro Kakoussian
 Physicians for Social Responsibility Los Angeles (PSR-LA)

Nile Malloy
 California Environmental Justice Alliance

Nayamin Martinez
Central California Environmental Justice Network

Brian Shobe
California Climate and Agriculture Network

Zack Deutsch-Gross
Transform

Shoshana Wechsler
Sunflower Alliance

Jack Eidt
SoCal 350 Climate Action

Lolly Lim
The Greenlining Institute

Asha Sharma
Sierra Club California

Ben Schwartz
Clean Coalition

Kevin D. Hamilton
Medical Advocates For Healthy Air

Jamie Court
Consumer Watchdog

Kyle Ferrar
Fracktracker Alliance

Phil Glosserman
Third Act SoCal

J.T. Harechmak
Non-Profit Housing Association of Northern California

Jenna Roper
Central California Asthma Collaborative

Matt Leonard
Oil and Gas Action Network

Robert M. Gould, MD
San Francisco Bay Physicians for Social Responsibility

Laurel Paget-Seekins
Public Advocates

Matthew Baker
Planning and Conservation League

Carter Lavin
Transbay Coalition

Lesley Beatty
ClimatePlan

Colin Fiske
Coalition for Responsible Transportation Priorities

Chris Roberts
SanDiego350

Katie McCammon
350 Sacramento

Leif Gensert
RideSD

Matthew Simmons
Environmental Protection Information Center (EPIC)

David Diaz
Active San Gabriel Valley

Phoebe Seaton
Leadership Counsel for Justice and Accountability

Alma Martinez
Center on Race, Poverty & the Environment

Justin Hu-Nguyen
Bike East Bay

Laura Solorio
Protect Monterey County

Lucia Marquez
Central Coast Alliance United for a Sustainable Economy (CAUSE)