Glen MacLeod

I am writing to express serious concerns regarding the California Air Resources Board's proposed amendments to the Mandatory Reporting of Greenhouse Gas Emissions. According to CARB's own analysis, the proposal is expected to impose approximately $124 billion in costs, which will ultimately be borne by taxpayers and consumers. At the same time, CARB asserts that these costs will be offset by roughly $123 billion in projected medical savings. This near one-to-one offset raises significant questions about the underlying assumptions and analytical rigor used to justify the rule. Given the scale of the economic burden, it is essential that both the cost estimates and the claimed benefits be supported by transparent, credible, and independently verifiable evidence.

There is reason to approach these projections with caution. California has a well-documented history of large-scale infrastructure cost estimates proving to be significantly understated. For example, the California High-Speed Rail Authority initially presented cost projections for the state's high-speed rail project that have since grown multiple-fold as the project advanced. This precedent underscores the risk that the current $124 billion estimate may likewise be understated, especially given the complexity and long time horizon of the proposed regulatory changes. If costs are underestimated, the financial burden on households and businesses could be substantially greater than currently acknowledged.

Equally concerning is the assertion of $123 billion in medical benefits. CARB's proposal does not appear to cite sufficient peer-reviewed scientific research to substantiate benefits of this magnitude, nor does it clearly establish a direct causal link between the specific reporting amendments and the projected health outcomes. Without rigorous, independently validated evidence, these claimed benefits remain speculative. Public policy decisions of this scale should not rely on optimistic or unverified projections, particularly when they are used to justify imposing significant economic costs on the public.

For these reasons, I urge CARB to revisit its cost-benefit analysis with greater transparency and methodological rigor. At a minimum, the Board should provide detailed documentation of its assumptions, subject its projections to independent peer review, and fully account for the risk of cost overruns. Until such analysis is completed and validated, proceeding with the proposed amendments would place an unjustified and potentially substantial burden on California residents and businesses.