

Randee Roberts

Dear California Air Resources Board (CARB) Members,

I am writing as a concerned California resident to submit this public comment in strong opposition to the proposed amendments to the Cap-and-Invest program, which would tighten emissions caps and further reduce free allowances for refiners starting in 2026. These changes, while framed as steps toward climate goals, will impose devastating economic burdens on working families, small businesses, and communities already struggling with the highest gas prices in the nation—averaging over \$5 per gallon according to AAA data. I urge you to reject these amendments in their current form and prioritize affordable energy solutions that don't punish everyday Californians.

First, the proposed reductions in free allowances for oil refiners will inevitably drive up gasoline and diesel prices by 47 cents to \$1.20 per gallon as early as next year, according to analyses from the Western States Petroleum Association and independent economic models. This isn't speculation; it's basic supply-chain economics. With refineries like Phillips 66's Los Angeles facility set to close by late 2025—eliminating 10% of our state's refining capacity—these amendments will exacerbate fuel shortages and volatility. Families in rural areas like Kern County, where I have ties through community and economic impacts, will be hit hardest. A single parent commuting 30 miles to work could see their monthly fuel costs rise by \$100 or more, forcing impossible choices between groceries, rent, and transportation. How does this advance equity or environmental justice when it disproportionately harms low- and middle-income households?

Second, these changes threaten thousands of good-paying jobs in California's oil and gas sector, which supports over 200,000 direct and indirect positions statewide, many in underserved communities of color. The program's extension to 2045 without adequate transition support ignores the human cost: shuttered refineries mean lost livelihoods, reduced local tax revenues for schools and infrastructure, and a ripple effect on suppliers from trucking to manufacturing. CARB's own documents acknowledge the need for "decarbonization," but rushing these caps without proven alternatives—like scalable biofuels or hydrogen infrastructure—risks energy insecurity. We've seen this playbook before with premature EV mandates that left rural charging deserts in place. Why accelerate pain now when global markets still rely on California-produced fuels?

Environmental protection is vital, and I support California's leadership on climate. But Cap-and-Invest, rebranded or not, has already failed to deliver promised benefits without the pain. Emissions haven't dropped as aggressively as projected, yet household costs have soared. These amendments double down on a flawed approach that prioritizes abstract targets over real-world affordability. Instead, CARB should:

- Delay implementation until independent audits confirm no net price spikes above 20 cents per gallon.
- Invest in workforce retraining and just-transition funds for affected workers, funded by program revenues rather than new burdens.
- Explore market-based incentives for cleaner fuels that don't dismantle our refining backbone overnight.

California deserves bold climate action that unites us, not divides us through regressive costs. I implore you to listen to the voices of impacted residents and vote down these harmful amendments. Our state's innovation can lead the world in clean energy—without bankrupting its people.

Thank you for considering this comment. I look forward to a more balanced path forward.