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April 29, 2026

Hon. Chair Lauren Sanchez  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Submitted via [www.carb.commentinput.com](http://www.carb.commentinput.com)

**Re: (15-day) Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market- Based Compliance Mechanisms Regulation**

Dear Chair Sanchez,

On behalf of the San Francisco Building and Construction Trades Council, I am writing to be clear about what is at stake in the proposed amendments to the Cap-and-Invest Program scheduled for May 28, 2026.

We support California's climate goals—and our members are the ones building them. Every day, our workforce is constructing the transit systems, electrification projects, and climate-resilient infrastructure that this state depends on to reduce emissions and grow its economy. That is why this proposal is so concerning.

Let's be clear: shifting billions of dollars out of the Greenhouse Gas Reduction Fund to expand short-term ratepayer subsidies comes at the direct expense of the long-term investments California needs to meet its climate goals. This proposal would reduce available funding by roughly \$2 billion annually through 2030, effectively cutting in half the resources available for critical programs.

The result is predictable. Programs like the Affordable Housing and Sustainable Communities Program (AHSC), the Transit and Intercity Rail Capital Program (TIRCP), and the Low Carbon Transit Operations Program (LCTOP) will be left without the funding they need to deliver projects. Those aren't abstract programs. They are jobs. They are housing. They are the transit systems that working people rely on every day.

In San Francisco, we have seen exactly what these investments deliver. Since 2018, the city has received approximately \$414 million through AHSC, financing over 2,100 affordable housing units. Our transit system has also benefited from more than \$400 million through TIRCP and \$141 million through LCTOP—funding that has supported critical improvements, from system upgrades to making MUNI safer, faster, and more reliable. These are real projects in real communities,

supporting real jobs. When this funding is reduced, those projects don't move forward, and working people feel it first.

Transit investment is not optional—it is the backbone of any serious climate strategy and a cornerstone of our economic recovery. When we invest in transit, we reduce emissions at scale, we connect communities to opportunity, and we put people to work in good union jobs. Cutting those investments to fund short-term subsidies is a step backward for both our climate goals and our economy.

We are also aligned with the State Building and Construction Trades Council of California, which has raised serious concerns about the broader impacts of these regulations on in-state jobs, industrial investment, and long-term economic stability. As they point out, California's skilled workforce is already building the next generation of clean energy infrastructure—from carbon capture to alternative fuels to renewable energy—and that work depends on policies that create certainty and sustain investment in this state.

We cannot afford to adopt policies that undercut that progress. When California fails to provide a stable and balanced framework, investment leaves, jobs disappear, and emissions don't go down—they just move somewhere else under weaker standards. CARB needs to fix this.

At a minimum, these amendments must be revised to ensure that core climate investment programs—especially transit—are protected and fully funded. The state cannot meet its climate goals without a sustained pipeline of infrastructure work, and that work depends on these investments.

California has led the nation by pairing ambitious climate policy with real investment in infrastructure and working people. This proposal breaks that model. It trades long-term progress for short-term relief, and in doing so, it undermines the very foundation of our climate strategy. We urge you to make the necessary changes before these amendments move forward.

Sincerely,



Rudy Gonzalez  
Secretary-Treasurer