

#24 Kase Valenzuela  
Communities for better Environment



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,

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 Communities for a Better Environment

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 Center for Community Action and Environmental Justice

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Matt Leonard  
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