

May 4, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed 15-Day Changes to the Cap-and-Invest Program

Dear Chair Sanchez, Board Members, and Staff:

We are writing as a broad coalition of stakeholders concerned with our climate and the communities most impacted by the affordability and air pollution crises to urge the Board to reject the proposed 15-day changes on May 28, 2026.

CARB staff is proposing 15-day changes that undermine our climate goals by giving significant new incentives to industry at the cost of the programs that invest in the communities we serve. This detrimental decision jeopardizes our ability to meet our climate targets and to address the urgent affordability crisis across California. There is no evidence or assurance that these additional industry incentives will reduce costs for consumers, and the changes to the Climate Credit will actually decrease the amount of relief going to ratepayers.

Many of us were deeply engaged in the renewal of the Cap-and-Invest Program last year. We were glad to see dedicated revenue from the Greenhouse Gas Reduction Fund to critical programs that fund affordable housing, clean transit and transportation, clean water, and clean air. However, these proposed 15-day changes would drastically reduce revenue resulting in the defunding of these critical programs -- a clear contradiction to legislative intent.

Additionally, there is no clear reasoning for CARB's decision to upend the program at this time. Changing the name to "Cap-and-Invest" and making other changes to align the post-2030 program with the recent legislative direction can happen at any time. We reject the artificial urgency narrative that has led us to this moment and urge you to reject these proposed changes and allow the program to continue as it is until a more thoughtful set of changes can be developed and deliberated.

Now is not the time to move recklessly, or to abandon the communities struggling the most to adapt to our changing climate and navigate this affordability crisis. Please reject these proposed 15-day changes.

Sincerely:

Alma Martinez
Center on Race, Poverty & the Environment

Carter Lavin, Co-Founder
Transbay Coalition

Kelsey Hinton, Policy Director
Community Water Center

Nick Lapis, Director of Advocacy
Californians Against Waste

Laurel Paget-Seekins, Senior Policy Advocate
Public Advocates

Lesley Beatty
ClimatePlan

Bob Allen, Policy & Advocacy Campaign Director
Urban Habitat

Wes Reutimann, Deputy Director
Active San Gabriel Valley

Colin Fiske, Executive Director
Coalition for Responsible Transportation Priorities

Catherine Garoupa, Executive Director
Central Valley Air Quality Coalition

Matthew Baker, Policy Director
Planning and Conservation League

Marven Norman, Environmental Policy Analyst
Center for Community Action and Environmental Justice (CCA EJ)

Isabel Ebner, Acting Executive Director
Sustainable Claremont

Lauren Gallagher
Communities for a Better Environment

Kaya Allan Sugerman, Director of Health & Environment Programs
Physicians for Social Responsibility - Los Angeles

Sarah Aird, Policy Director
Californians for Pesticide Reform

Mariela Ruacho, Senior Policy Advocate
Leadership Counsel for Justice and Accountability

Nile Malloy
California Environmental Justice Alliance

Jenna Roper, Senior Policy Associate
Central California Asthma Collaborative

Heng Lam Foong and Kyle Tsukahira, Co-Directors
Asian Pacific Islander Forward Movement

Nayamin Martinez
Central California Environmental Justice Network

Christina Scaringe, California Climate Policy Director
Center for Biological Diversity