

District Council of Iron Workers of the State of California and Vicinity

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Submitted Electronically

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

RE: Workforce Impacts of CARB's Proposed Cap-and-Invest Regulation

Chair Sanchez:

On behalf of the District Council of Iron Workers of California and the Vicinity (DCIW), I write to express strong opposition to the current California Air Resources Board's proposed amendments to the Cap-and-Invest program and the profound consequences these changes will have on California's industrial workforce, refinery operations, and economic stability.

Iron workers build, maintain, and modernize California's refineries, energy infrastructure, and industrial facilities. These are highly skilled, career paths that support thousands of working Californians. Policies that undermine the continued operation of these facilities directly threaten that workforce.

These are not hypothetical impacts. California has already lost nearly 18 percent of its in-state refining capacity in recent years, eliminating major sources of union construction work and tightening fuel supply across the state. The current proposed Cap-and-Invest changes would significantly increase fuel costs for California consumers.

For working Californians, especially those who rely on their vehicles for work, like the iron workers, **these costs are real and immediate**. Most of our members drive long distances to reach job sites throughout the state. Policies that intentionally raise fuel costs function as a direct tax on the very workers who build California's infrastructure.

DCIW support California's climate goals, and our members are building renewable energy infrastructure across the state every day. But a responsible energy transition requires maintaining the existing industrial system while renewable infrastructure is built. The DCIW believes California can pursue climate progress without sacrificing its industrial workforce or energy reliability.

CARB's proposal moves in the opposite direction. Instead of supporting a managed transition, these amendments risk prematurely dismantling California's existing energy infrastructure, destroying union construction careers, and exporting both emissions and industrial production out of state.

California's refineries operate under the most stringent environmental and safety standards anywhere in the world. Maintaining those standards requires a highly trained union workforce with decades of expertise in refinery maintenance, industrial safety, and environmental compliance.

We strongly urge CARB to reconsider these amendments and engage directly with California's union construction workforce before adopting regulations that could permanently damage the state's industrial capacity.

Sincerely,

David S. Osbourne

David S Osborne

President

District Council of Iron Workers of California and the Vicinity