

To the California Air Resources Board:

I am submitting this public comment in response to the proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation.

I am a small business owner and resident of Arroyo Grande, California, on the Central Coast. I write not in opposition to California's climate goals, but to raise a serious concern about whether the current regulatory trajectory is achieving its intended environmental outcomes.

California has lost approximately 20% of its in-state petroleum refining capacity over the past year, with major facilities including Phillips 66 and Valero Benicia closing or curtailing operations. A significant driver of these closures is the cumulative regulatory and compliance cost burden imposed by the Cap-and-Trade program, which has made continued investment in California refining economically unviable.

The unintended consequence is that California now imports a growing share of its refined gasoline from overseas suppliers — transported via ocean-going tankers with substantial greenhouse gas emissions from shipping. The net carbon result of this shift has not, to my knowledge, been fully accounted for in CARB's environmental modeling.

I respectfully request that the Board address the following question in its rulemaking record: Has CARB conducted a lifecycle emissions analysis comparing the GHG footprint of California-refined gasoline versus imported refined gasoline, including upstream shipping emissions? If not, I urge the Board to commission such an analysis before finalizing these amendments.

A policy that reduces in-state refining while increasing imports may be shifting emissions offshore rather than eliminating them — a result that undermines California's global climate leadership and imposes significant cost burdens on working families and small businesses before viable alternatives are accessible.

I urge the Board to consider a transition framework that preserves adequate in-state refining capacity during the period in which zero-emission alternatives are being scaled, in order to avoid unintended increases in lifecycle greenhouse gas emissions.

Thank you for the opportunity to comment.