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California Air Resources Board  
1001 I Street  
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**Subject: Public Comment on (15-day) Proposed Amendments to the Cap-and-Invest Regulation**

To the Executive Officer and Members of the Board:

I am writing to submit comments on CARB's proposed amendments to the California cap on greenhouse gas emissions and market-based compliance mechanisms regulation.

We appreciate the complexity of the issues before the Board and CARB's stated goals of affordability, market stability, emissions reductions, and public health protection. However, the concerns now being raised by legislators and community advocates deserve consideration. The proposed amendments could have long-lasting consequences for California's 2030 climate target and the Greenhouse Gas Reduction Fund (GGRF). They could also affect the climate investment framework California has worked hard to build over the past decade, reducing the state's ability to incentivize the technologies, companies, community partnerships, and public-health tools that Cap-and-Invest was designed to accelerate.

California's Cap-and-Invest program has always been more than a compliance market. It is a public investment engine. CARB has described the program as creating "a powerful economic incentive for significant investment in cleaner, more efficient technologies," and the Legislature's 2025 reauthorization was intended to provide long-term certainty so businesses could make long-term investments in California's climate future. That certainty is now in question.

This matters because the GGRF has become one of California's most important tools for building the clean economy. Nearly \$33 billion has been raised from cap-and-trade auction proceeds to fund climate solutions, with funds allocated across 117 programs statewide. In 2024 alone, California Climate Investment programs implemented nearly \$1.9 billion through approximately 11,700 new projects expected to reduce 7.0 million metric tons of carbon dioxide equivalent over their lifetimes.

Those investments have helped make California an admired global leader in clean innovation. Through GGRF and California Climate Investments, the state has supported zero-emission trucks and buses through HVIP, charging and hydrogen fueling infrastructure, pre-commercial demonstrations of advanced vehicles and equipment, and community-driven Transformative Climate Communities projects. These investments have also advanced industrial decarbonization, grid-support technologies, carbon removal innovation, food production decarbonization, methane-reducing dairy digester projects, and the Statewide Mobile Monitoring Initiative – a project Aclima has been proud to help implement.

Aclima was founded because California made the green economy possible. The promise of Cap-and-Invest was not only to reduce emissions, but to create market opportunities for companies building the tools needed for a healthier, more accountable, more equitable, lower-pollution future. Aclima built toward that vision.

The Statewide Mobile Monitoring Initiative (SMMI), funded through California Climate Investments and implemented by CARB, *is a concrete example of that promise in action*. SMMI is delivering innovative block-by-block air pollution data to 62 California communities and 5.2 million Californians, with community-directed monitoring in partnership with community-based organizations, and helping to drive public-health benefits in communities that have historically lacked access to hyperlocal air quality information.

The program is already demonstrating meaningful results: approximately 5 billion data points generated, 782,318 miles driven, 128 community meetings with roughly 2,200 attendees, 1,500 community survey responses, 39 community-based organization partners, more than \$1.7 million directed to CBOs leading engagement, and 107 local green jobs created. Community leaders have called for SMMI's expansion to all pollution-affected communities because "air pollution and air toxics know no boundaries."

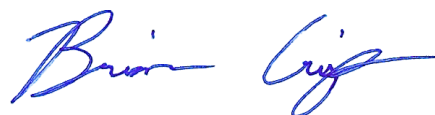
SMMI shows what's possible when California's climate investment framework is strong and directed toward public benefit programs. If proven community-serving GGRF-funded initiatives are allowed to disappear just as they begin to succeed, California risks sending the wrong signal to the clean-economy businesses it has worked so hard to attract and grow.

California has proven that it can reduce emissions, create jobs, strengthen communities, and build new markets. Governor Newsom has said that "cutting pollution creates jobs and boosts communities," and California has the receipts: billions of dollars invested, thousands of projects funded, and cleaner technologies moving from promise to deployment. CARB should not adopt amendments that jeopardize that progress.

For these reasons, Aclima respectfully urges CARB to revise the proposed amendments to preserve the integrity of the Cap-and-Invest program, protect the state's GGRF investment capacity, and ensure California continues to support the clean innovation economy it has spent more than a decade building.

Thank you for your consideration. Please do not hesitate to contact me if you have questions or would like to discuss Aclima's view on the importance of preserving GGRF's role in California's climate innovation economy.

Sincerely,



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