

Sunflower Alliance (Shoshana Wechsler)

The program amendments announced on April 14th, 2026 undermine the integrity of the emissions cap, jeopardize California's ability to meet the statutory 2030 climate target, and redirect billions of dollars in funding that should go to climate investments and energy affordability.

In alignment with the environmental justice community, we would like to request that CARB update and finalize the regulation in time to implement changes this fall with the following critical revisions:

1. Remove the Manufacturing Decarbonization Incentive (MDI) mechanism from the proposal and retire 118M allowances so that regulations can be swiftly adopted to secure program outcomes this fall, without harming the integrity of the emissions cap or jeopardizing the 2030 climate target.
2. Ensure that program amendments do not undermine legislative commitments to maintain affordability and adequate levels of program funding for the California Climate Credit and Greenhouse Gas Reduction Fund (GGRF), most critically for AB 617 communities and community air protection programs. The current proposal significantly increases free allowances to industry, effectively shifting billions from household affordability measures to polluting industries.