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May 1, 2026

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

RE: Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms – Significant Concerns

Chair Sanchez:

I write to you today on behalf of Trust for Public Land (TPL) to express our **significant concerns** with the *Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms (Proposed Amendments)*, released by the California Air Resources Board (CARB) on April 14, 2026. The Proposed Amendments are expected to be considered by CARB at its May 28-29, 2026, monthly meeting.

In 2025, we supported the efforts of the Newsom Administration and the Legislature to extend the Cap-and-Trade program beyond 2030. We did so by recognizing the critical role the program plays in helping California meet its long-term climate and air quality goals, and by understanding that early action was necessary to stabilize the market and sustain investments from the Greenhouse Gas Reduction Fund (GGRF) in key climate programs. We were pleased to see that enacted legislation extended the program through 2045 and maintained a strong commitment to continued climate investments benefiting communities across the state. In today's political climate, it strongly signaled California's continued climate leadership.

However, we are gravely concerned with the program's proposed direction, as identified by CARB in the Proposed Amendments. Specifically, we are concerned with the Proposed Amendments' proposal to increase allowances across several areas. This proposal, while well-intentioned, would reduce the Greenhouse Gas Reduction Fund (GGRF) revenue by a commensurate amount annually.

This reduction threatens the funding of programs essential to achieving California's climate, conservation, and equity goals. In particular, programs supporting urban greening and forestry,

the Sustainable Agricultural Lands Conservation (SALC) Program, and the Transformative Climate Communities (TCC). These programs are all tools for sequestering carbon, reducing urban heat, improving air quality, protecting working lands, increasing climate resilience, and expanding access to nature in underserved communities. As the state faces a structural budget deficit, GGRF revenues are essential to funding climate programs.

We are concerned that diminished investment in these areas will undermine the state's ability to meet its 2030 greenhouse gas reduction targets. These programs have delivered measurable climate benefits while also advancing public health, environmental equity, and community resilience. They represent some of the most effective, place-based strategies for addressing the impacts of climate change, especially in disadvantaged communities.

TPL agrees that affordability must be addressed. We serve many of the communities that struggle the most with affordability in our work. However, affordability must be understood more broadly. For the communities we serve, affordability includes access to safe parks and green spaces, cooler, healthier neighborhoods, protection from climate impacts such as extreme heat and flooding, and the preservation of working lands that sustain local economies and food systems. Our communities have and will continue to be disproportionately impacted by climate change.

Investments in urban greening, forestry, SALC, and TCC directly contribute to these outcomes. Reducing GGRF funding risks reversing progress in communities that have historically lacked access to these essential resources. **We urge CARB to revisit the Proposed Amendments and ensure that GGRF funding for these critical programs is maintained at robust levels.** Protecting these investments is essential not only for meeting the state's climate targets but also for delivering lasting, equitable benefits to all communities across California.

We know that CARB is balancing numerous objectives with the Proposed Amendments and is working to enact a final regulation that furthers the state's climate and air quality goals while also addressing affordability issues faced by Californians. We ask that you consider the importance of the GGRF-funded programs and their role in addressing affordability and incorporate this more expansive understanding into the final regulation.

As we continue to review the Proposed Amendments, we look forward to engaging with you on the impact on GGRF-funded programs.

Sincerely,

Juan Altamirano
Director of Government Affairs
Trust for Public Land