David Hildebrandt

Dear California Air Resources Board Public Comment,

I am writing to submit a public comment opposing CARB's draft regulations for the Cap-and-Invest program.
CARB should not rush through destabilizing regulations on a self-imposed timeline that fails to address economic concerns. If increased compliance costs significantly harm refiners' ability to operate, demand for transportation fuels will not disappear. Instead, California will likely import more gasoline, diesel, and jet fuel from outside the state, shifting emissions elsewhere and potentially raising costs for consumers here at home.
The current proposal is a direct threat to affordability and reliability:
- Maintaining and upgrading refineries requires hundreds of millions of dollars in ongoing investment. If the numbers don't pencil out due to increased Cap-and-Invest costs, that capital may go elsewhere.
- Increased compliance costs and refinery closures (along with the potentially decrease in supply) will likely ultimately hurt the consumer the most. California's policies should not punish the most vulnerable residents.
- Energy jobs and local tax revenue that support community services will be lost if refineries close.
- Becoming dependent on production outside of California runs counter to the state's environmental goals.

Oil and gas remain essential to California's economy. Demand remains for tens of billions of gallons of gasoline, diesel, and jet fuel powering consumers and the businesses they rely on. Increasing costs on California refiners to the point they consider leaving the state likely only shifts production elsewhere and punishes people at the bottom of the economic ladder.
Please pause this rulemaking and revise the draft regulations to address affordability before moving forward.

Sincerely,
Mr. David Hildebrandt