

# East Bay Regional Park District (Max Korten)

April 27, 2026

Chair Lauren Sanchez  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Members of the Board  
California Air Resources Board (CARB)  
1001 I Street  
Sacramento, CA 95812

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

Dear Chair Sanchez and CARB Board Members and Staff,

The East Bay Regional Park District respectfully requests additional time to review and fully evaluate this complex set of proposed changes. Given the scope, technical nature, and potential long-term implications of these revisions, it is important stakeholders have sufficient opportunity to understand how the proposals may affect environmental outcomes and program revenue and implementation.

The Park District also seeks assurance that any modifications will meaningfully support California's transition to a circular economy. This includes taking a comprehensive approach which accounts for the full lifecycle impacts of materials, as well as the interconnected environmental, economic, and community considerations associated with these policies.

Finally, we encourage a holistic evaluation of potential trade-offs, including impacts on greenhouse gas emissions, natural resource conservation, ecosystem health, program revenue, and local economies. Ensuring proposed changes are aligned with the State's broader climate and sustainability goals, and support stable, predictable funding, will be essential to achieving durable and equitable outcomes.

Sincerely,

Max Korten  
Acting General Manager  
East Bay Regional Park District