



May 28, 2026  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Item 26-3-2: Reject the 15-Day Changes to the Cap-and-Invest Regulation**

Dear Chair Sanchez and members of the California Air Resources Board:

Public Advocates writes in opposition to MDI and the expanded cap and encourages the board to reject the 15-day changes. You have the power to stop this and we hope you use it.

Public Advocates is a 55-year-old nonprofit civil rights law firm and advocacy organization dedicated to making rights real for low-income Californians and communities of color. We've been engaged in GGRF advocacy since its inception.

The largest oil and gas companies are projected to reap more than \$230 billion in excess profits this year. It is deeply concerning that this proposal intends to slash investments in clean air, clean water, public transit, and affordable housing in frontline communities in order to give \$4 billion to polluters with half earmarked for oil refineries. This is not an affordability strategy for regular Californians. There are no requirements or guarantees that energy and oil companies will restrict prices to consumers.

GGRF investments are not abstract line items in a budget. They determine whether a student can afford to get to school, whether a senior can make it to a doctor's appointment, whether a family can live near reliable transit instead of enduring punishing commutes. AHSC, LCTOP, and TIRCP are among California's most effective climate investments. They reduce emissions, expand mobility, leverage federal funding, and deliver tangible benefits to the communities that have borne the greatest environmental and economic burdens for decades.

California cannot claim climate leadership while dismantling the programs that make that leadership real. Please reject the 15-day changes and protect investments that improve lives, reduce pollution, and move us toward a more equitable future.

Sincerely,

Michelle Pariset  
Director of Legislative Affairs  
Public Advocates, Inc.