



April 28, 2026

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

Board Members
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Sacramento, CA 95812

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

Dear Governor Newsom, Chair Sanchez, and CARB Board Members and Staff,

Last year, Governor Newsom signed into law a reauthorization of the Cap-and-Invest program, extending California's economy-wide emissions reduction program and shoring up an essential source of funding for climate investments in California communities.

The California Habitat Conservation Planning Coalition respectfully requests additional time to review and evaluate the elements of the latest rulemaking proposal, released on April 14th, 2026.

Following the release of the proposed amendments, an early analysis indicates that a new enhancement to the regulation's affordability provisions, which aim to increase the existing climate credit provided to utility customers, could result in a significant reduction in Greenhouse Gas Reduction Fund revenues and risk long-term funding for all priorities that rely on this funding.

Given the potential impact of the proposed amendments, we request more time to review and fully understand a complex set of changes, and assurance that any changes keep GGRF revenue stable and consistent.

Sincerely,

Edmund Sullivan
Steering Committee Member
California Habitat Conservation Planning Coalition