

Good morning. My name is John Sanders, and I represent a business operating in Kern County.

What I'm hearing today raises serious concerns about how CARB is moving toward expanding its regulatory justification framework.

This presentation makes a critical admission that cannot be overlooked, **these are individual consultant recommendations that do not account for legal constraints, resource constraints, or implementation realities.** Yet the direction being outlined today appears to move toward integrating these concepts into future regulatory analysis.

That is a problem.

CARB's current methodology already acknowledges that it captures only a limited subset of health impacts. Instead of resolving those limitations with validated, measurable improvements, the proposal is to expand into increasingly complex, multi-variable modeling, incorporating long-term conditions, cumulative burdens, and social and economic factors.

**At that point, this is no longer just environmental health science. It becomes a policy-driven model where assumptions, weighting decisions, and methodological choices can materially influence outcomes.**

The presentation also acknowledges that the most accurate modeling approaches are too resource-intensive to implement, and that reduced-complexity models may be used instead. That raises a direct question: **how can CARB rely on simplified models to support increasingly complex conclusions without clearly demonstrating accuracy and reliability?**

There is also a fundamental issue with shifting to hyper-local, census-tract level analysis. While greater resolution may sound beneficial, it also increases the risk of over-interpreting modeled data at scales where uncertainty is highest. More detail does not automatically mean more accuracy.

And finally, the integration of social and economic factors into health impact modeling raises serious concerns about consistency and objectivity. These are important considerations, but **they introduce variables that are not directly tied to emissions**, and that can be interpreted in ways that expand regulatory reach without a clear scientific boundary.

If CARB intends to move in this direction, then the burden must be higher, not lower. That means full transparency of assumptions, clear validation against real-world data, disclosure of uncertainty ranges, and a demonstration that these methods can be applied consistently and fairly across regions.

For communities like mine, these are not abstract models. **These decisions affect real operations, real jobs, and real economic stability.** Expanding the analytical framework without fully addressing feasibility, accuracy, and implementation impacts risks creating policy that is neither predictable nor grounded in practical reality.

Before any of these methodologies are incorporated into regulatory decision-making, CARB should pause, validate, and clearly define the limits of these tools.”

Thank you.

JOHN SANDERS