

Congress of the United States
Washington, DC 20515

October 24, 2024

The Honorable Liane Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Chair Randolph,

We write today to request an immediate delay of CARB's upcoming Lower Carbon Fuel Standard (LCFS) hearing scheduled for November 8th. We also request that CARB take immediate action to analyze the cost to consumers of proposed LCFS amendments through updated regulatory impact analysis. Only then can CARB ensure that Californians have been afforded their rightful opportunity to an informed public comment process before imposing undue costs on their bottom line.

As CARB acknowledged in its September 2023 Standardized Regulatory Impact Assessment (SRIA),¹ more stringent carbon intensity standards would create a hidden 47 cent per gallon fee on California drivers every time they go to the pump in 2025, as well as similarly burdensome increases in the ensuing years. Additionally, California's Independent Emissions Market Advisory Committee estimates that CARB's current policy trajectory could singlehandedly raise gas prices by 85 cents per gallon by 2030.

Perhaps the only thing more alarming than these exorbitant regulatory costs is CARB's recent admission that it has no plans to reissue regulatory impact analysis prior to making additional LCFS amendments. Obscuring the most important data point from future energy policy decisions is unconscionable and casts serious doubt over the soundness of all pending LCFS actions.

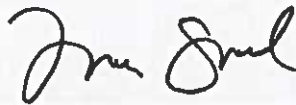
CARB's new and opaque approach comes as Californians continue to weather gas prices \$1.50 per gallon above national averages, as well as a July hike in the gas excise tax to 59.6 cents per gallon. CARB has misleadingly billed these amendments as a regulatory burden limited to fossil fuel producers and importers. Unfortunately, there is no doubt that Californians will continue to pay the price.

Allowing these amendments to move forward – especially absent basic economic impact analysis – will result in an added economic burden on Californians when they are already struggling with elevated energy, food, and housing costs. Now, more than ever, is not the time for leaders in Sacramento to hide the costs of their misguided environmental agenda.

¹ https://ww2.arb.ca.gov/sites/default/files/2023-09/lcfs_sria_2023_0.pdf

The only tenable path forward is for CARB to immediately focus on analyzing and communicating its policies' impact on consumers in our state. It is well established that those with less economic means bear a disproportionate burden when government mandates raise basic costs of living. For this reason, we implore CARB to carefully consider how proposed amendments will affect low-income and disadvantaged populations throughout California. Failure to provide complete transparency and adhere to a well-defined process for public feedback seriously risks invalidating CARB's ultimate policy decisions. These risks can be mitigated, and we urge you to take prompt administrative action to delay the November 8th hearing as you develop a more robust understanding of proposed amendments' economic implications.

Sincerely,



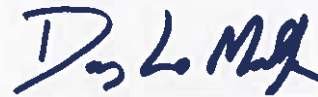
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