



COMMUNITIES
FOR A BETTER
ENVIRONMENT
established 1978



April 24, 2024

Chair Liane Randolph
California Air Resources Board
1101 I Street
Sacramento, CA 95814
cotb@arb.ca.gov

Re: Community Response to Flawed Low Carbon Fuel Standard Amendment Process

Dear Chair Randolph,

On behalf of the undersigned organizations, we write regarding the Low Carbon Fuel Standard (LCFS) and the flawed public process during the current rulemaking. We remain concerned that CARB staff is neither listening to nor internalizing the input from community groups, environmental groups, and scientists. Because the April 10th workshop was set up to be so narrow in scope, community concerns were ignored and drowned out, as were our positive proposals for improving the program.

Given these consistent and persistent process failures by staff, we can no longer trust in these processes, which appear designed to prop up polluting industries and marginalize our

voices and priorities. As such, we will be organizing our own Community Workshop to allow for an open discussion of the current proposal and tangible solutions that actually support CARB's goals. We will invite all the Board members, and we encourage all of them to attend to hear directly from community members.

While we acknowledge the important role of CARB staff in the agency's policymaking activities, authority rests with the Board to adopt amendments to the LCFS. It is imperative that the Board, and particularly subquorum members, hear directly from the lay leaders, researchers, and advocates who have been working diligently throughout this rulemaking process to inform an LCFS that does not perpetuate environmental injustice, that does prioritize air quality improvements, and does not reward paper pollution reductions over real climate solutions. We are confident the Board will be better equipped to guide this important rulemaking if they are given an opportunity to hear directly from these advocates and scientists without distortion or misrepresentation we've seen and heard time and again from CARB staff and certain industry representatives. Of course, we will invite CARB staff to attend this Community Workshop in listening mode so they can hear community concerns and ideas.

We appreciate your consideration of these comments and our forthcoming invitation to join our Workshop. We encourage the Board to actually fix the LCFS. At a minimum, we encourage you and the other subquorum members to attend this Community Workshop, about which we will be providing logistical details in the coming weeks.

Sincerely,

Ana Gonzalez

Executive Director

Center for Community Action and Environmental Justice

Chirag G. Bhakta

California Director

Food & Water Watch

Defensores del Valle Central para el Aire y Agua Limpio

Román Partida-López
Senior Legal Counsel, Transportation Equity

The Greenlining Institute

Faraz Rizvi
Policy & Campaign Manager

Asian Pacific Environmental Network

Amelia Keyes
Attorney & Legal Fellow

Communities for a Better Environment

Kyle Heiskala
Policy Co-Director, Regional and State Policy

Environmental Health Coalition

Elly Matsumura
California Director
PowerSwitch Action

Adrian Martinez
Attorney
Earthjustice

Phoebe Seaton
Co-Director and Attorney at Law
Leadership Counsel for Justice and Accountability

CC: Governor Newsom
Yana Garcia, Secretary for Environmental Protection
Dr. Steve Cliff