After carefully studying the proposed amendments to the low carbon fuel standard, I urge the board to reject the proposed amendments on the basis that they will discourage investment in clean fuel technologies and increase fuel prices for some of California’s most vulnerable communities.

This recommendation is based on many factors. Some of which include:

* Accelerating the carbon intensity reduction target to 22% by 2025 is too steep a ramp-up in such a short period of time.
* Putting a 20% cap on credits for biomass-based diesel from feedstocks would encourage some to return to using petroleum-based diesel, thus increasing carbon emissions from that fuel source.
* Excluding hydrogen produced from fossil fuels from credit eligibility will make hydrogen harder and more expensive to use and will disincentive investment in this area.

Undoubtedly, the biggest reason I urge the board to reject these amendments is the disproportionate financial hardship they will cause many of California’s most economically disadvantaged residents.

I recognize that CARB staff is putting forward what they believe is in California’s best interests, but these amendments will cause severe financial stress for many.

According to CARBS' own estimates, the price of a gallon of gasoline is projected to rise by a minimum of 47 cents a gallon, and the price of diesel is projected to rise even more.

These price increases will have a direct impact on Californians' daily lives. It will cost them more to drive to work, and it will raise the prices they pay for everyday goods and services, as businesses will surely pass down their increased operating costs to the end consumer.

I urge the Board to reject the proposed amendments.