

Marco Polo Cortes  
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San Diego County Hispanic Chamber of Commerce  
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My name is Marco Polo Cortes, and I'm President and CEO of the San Diego County Hispanic Chamber of Commerce.

We commend you for your efforts to combat global warming. But we have serious concerns about the cost, practicality and effectiveness of the rule you are being asked to approve today.

A 10% reduction in carbon in our fuels sounds simple on the surface, but in reality it's an enormous undertaking that is charting new territory and will require some very complicated changes in what goes into our fuel and what sources our fuel will come from in the future. Since a program of this magnitude hasn't been attempted anywhere else, it's hard to get your arms around exactly how it will work.

We don't know if the fuels, additives or technologies will be available, or even invented or perfected, to meet the requirements of this standard. We don't know what it will cost. We don't even know what the direct and indirect land use costs will be, or what the net environmental impacts will be.

If previous fuel reformulations are any guide, we know it will cost a lot. CARB cleaner-burning gasoline and California diesel are more expensive than fuels used in other states and other countries. That's troubling under the best of circumstances but very frightening considering today's economic conditions.

We're also very concerned that California is moving faster and farther than other states, the federal government and other countries. If California is the only state that enacts a rule this strict and expensive, it's just common sense that the biggest fuel users, such as manufacturers and truckers, will simply move out of state to places where it's not as expensive to do business. They'll just move their emissions out along with the jobs, taxes and economic value they once contributed to California. But the emissions will come back in, either on the wind or during transport of goods from outside our borders.

As a major Hispanic business organization in a border region, we are perhaps more keenly aware of this reality than others. This rule has real potential to create a serious economic and environmental imbalance. Our Chamber works hard to facilitate mutually beneficial business relationships and opportunities on both sides of the border. This productive balance could be severely disrupted by a California-only low carbon fuel standard. What good will it do if we export pollution to our neighbors to the south, and what good will it do to put our local businesses at a competitive disadvantage with those neighbors?

We urge you to take the time to coordinate more closely with the federal government and other states to craft a standard that will be cost-effective and environmentally effective as well.