



April 30, 2026 (Resubmitted on May 4, 2026)

Lauren Sanchez, Chair  
 California Air Resources Board  
 1001 I Street  
 Sacramento, CA 95814

**RE: Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms – Significant Concerns**

Chair Sanchez:

We, the undersigned transit agencies, metropolitan planning organizations, and regional transportation planning agencies, write to you today to voice our **significant concerns** with the *Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms (Proposed Amendments)*, released by the California Air Resources Board (CARB) on April 14, 2026. The Proposed Amendments are expected to be considered by CARB at its May 28-29, 2026, monthly meeting.

In 2025, we supported the efforts of the Newsom Administration and Legislature to extend the Cap-and-Trade program beyond 2030. We supported the proposed early action on the extension, as long-time partners to the state in combatting climate change and addressing air quality issues and because we understood that such action was critical to stabilizing the market and continuing investment from the Greenhouse Gas Reduction Fund (GGRF) in key climate programs. As the effort gained traction, we called on the state to maintain ongoing investment from the GGRF in the Affordable

Housing and Sustainable Communities Program (AHSC), Transit and Intercity Rail Capital Program (TIRCP), and Low Carbon Transit Operations Program (LCTOP), noting that these investments reduce greenhouse gas emissions, deliver air quality benefits and travel costs savings, and create jobs (in manufacturing, construction, maintenance, and operations). In our advocacy, we further argued that, as housing and transportation are the two largest household expenses, the state should consider investment in these programs to be part of the solution to California's affordability crisis. We were pleased to see that, consistent with our advocacy, the enacted legislation maintained continuous appropriations from the GGRF for the AHSC, TIRCP, and LCTOP while also committing – for the first time – ongoing funding for air quality initiatives in AB 617 communities.

Today, however, we voice our concerns with the Proposed Amendments' impact to the GGRF, which we believe will, in the upcoming fiscal years, zero out hard-fought annual funding for the AHSC, TIRCP, and LCTOP. More specifically, we estimate that we and the constituencies we serve will lose up to \$1.65 billion in GGRF annually – funding we have relied on for over a decade, without any plan from the state to backfill these losses. To date, these programs have invested a combined \$6.2 billion in projects and services that delivered generational projects, like affordable transit-oriented housing developments, major transit and rail capital projects and zero-emission transit vehicles as well as quality of life improvements, like transit service expansions and discounted transit passes. Most of this investment benefited California's priority populations, with 89% of total AHSC funding and 94% of total TIRCP and LCTOP funding being directed to disadvantaged and low-income communities.

As we understand it, CARB advanced this proposal in the Proposed Amendments in response to calls from some legislators and stakeholders to further address the affordability crisis faced by Californians. In objecting to the proposal, we want to be clear: we agree that the Proposed Amendments should, as called for by AB 1207, address affordability; we believe the Proposed Amendments must apply a broader definition of affordability. To the constituencies we represent and/or serve, addressing affordability requires continued state investment that supports good paying, life-sustaining jobs and means access to affordable housing and transit options, travel timing savings that buy Californians more time with family and friends, and personal health unburdened by the harms of air pollution. Unfortunately, the Proposed Amendments fail on these fronts and regress on the state's efforts to deliver more affordable housing units, more accessible and affordable public transit, and better air quality for our vulnerable communities by gutting key climate programs. **We call on the state to revisit the proposal and maintain robust funding in the GGRF for the AHSC, TIRCP, and LCTOP.**

We know that CARB is balancing numerous objectives with the Proposed Amendments and is working to enact a final regulation that furthers the state's climate and air quality goals while also confronting the challenges faced by regulated industries and everyday Californians. We ask that, as CARB advances the Proposed Amendments, that you consider the importance of the GGRF-funded programs and their role in addressing affordability and incorporate this more expansive understanding in the final regulation.

Sincerely,

Salvador Llamas  
General Manager / CEO  
**Alameda-Contra Costa Transit District**

Martin J. Tompkins  
Executive Director / CEO  
**Antelope Valley Transit Authority**

Maura F. Twomey  
Executive Director  
**Association of Monterey Bay Area Governments**

Rob Padgett  
Managing Director  
**Capitol Corridor**

Bill Churchill  
General Manager  
**Central Contra Costa Transit Authority  
(County Connection)**

Kaki Cheung  
Acting Executive Director  
**City/County Association of Governments  
of San Mateo County (C/CAG)**

Claude McFerguson  
Director of Transportation  
**City of Commerce Transit**

Anuj Gupta  
Director  
**City of Santa Monica Department of  
Transportation**

Dee Dee Cavanaugh  
Mayor  
**City of Simi Valley**

Jaime Wright  
Public Works Manager – Transit Services  
Department of Public Works  
**County of Placer**

Rashidi Barnes  
Chief Executive Officer  
**Eastern Contra Costa Transit Authority  
(Tri Delta Transit)**

Doran J. Barnes  
CEO  
**Foothill Transit**

Gregory A. Barfield  
Director  
**Fresno Area Express**

Vanessa Rauschenberger  
General Manager  
**Gold Coast Transit District**

Denis J. Mulligan  
General Manager  
**Golden Gate Bridge, Highway &  
Transportation District**

Arthur V. Sohikian  
Executive Director  
**High Desert Corridor JPA**

David Aguirre  
Executive Director  
**Imperial County Transportation  
Commission**

Stephanie Wiggins  
Chief Executive Officer  
**Los Angeles County Metropolitan  
Transportation Authority**

Christy Wegener  
Executive Director  
**Livermore/Amador Valley Transit  
Authority**

Kenneth A. McDonald  
President and Chief Executive Officer  
**Long Beach Transit**

Robert Betts  
General Manager  
**Marin Transit**

Andrew B. Fremier  
Executive Director  
**Metropolitan Transportation Commission**

Carl Sedoryk  
General Manager / CEO  
**Monterey-Salinas Transit**

Danielle Schmitz  
Executive Director  
**Napa Valley Transportation Authority**

Erin Rogers  
CEO and General Manager  
**Omnitrans**

Michelle Bouchard  
Executive Director  
**Peninsula Corridor Joint Powers Board  
(Caltrain)**

Henry Li  
General Manager / CEO  
**Sacramento Regional Transit District**

Mario Orso  
Chief Executive Officer  
**San Diego Association of Governments**

Sharon Cooney  
Chief Executive Officer  
**San Diego Metropolitan Transit System**

Rodd Lee  
Assistant General Manager, External Affairs  
**San Francisco Bay Area Rapid Transit  
District**

Seamus Murphy  
Executive Director  
**SF Bay Ferry / Water Emergency  
Transportation Authority**

Julie Kirschbaum  
Director of Transportation  
**San Francisco Municipal Transportation  
Agency**

Peter Rodgers  
Executive Director  
**San Luis Obispo Council of  
Governments**

April Chan  
General Manager / CEO  
**San Mateo County Transit District**

Jerry Estrada  
General Manager  
**Santa Barbara Metropolitan Transit District**

Carolyn M. Gonot  
General Manager / CEO  
**Santa Clara Valley Transportation Authority**

Corey Aldridge  
Chief Executive Officer  
**Santa Cruz Metropolitan Transit District**

Beth Kranda  
Executive Director  
**Solano County Transit**

Emily Betts  
Transit Manager  
**Sonoma County Transit**

James R. Cameron  
Executive Director  
**Sonoma County Transportation and Climate Authorities**

Eddy Cumins  
General Manager  
**Sonoma-Marin Area Rail Transit (SMART)**

Darren Kettle  
Chief Executive Officer  
**Southern California Regional Rail Authority (Metrolink)**

Mona Babauta  
CEO/General Manager  
**SunLine Transit Agency**

Todd A. Muck  
Executive Director  
**Transportation Agency for Monterey County**

Kevin Sheridan  
Executive Director / CEO  
**Tri-Valley – San Joaquin Valley Regional Rail Authority (Valley Link)**

Martin Erickson  
Executive Director  
**Ventura County Transportation Commission**

Rob Thompson  
General Manager  
**Western Contra Costa Transit Authority (WestCAT)**

cc: Members and Staff, California State Legislature  
Members, California Air Resources Board  
Jamie Callahan, Deputy Chief of Staff, Office of Governor Gavin Newsom  
Trey Reffett, Deputy Cabinet Secretary, Office of Governor Gavin Newsom  
Sarah Swig, Deputy Cabinet Secretary and Senior Advisor, Office of Governor Gavin Newsom  
Steve Cliff, Executive Officer, California Air Resources Board  
Rajinder Sahota, Deputy Executive Officer, California Air Resources Board  
Toks Omishakin, Secretary, California State Transportation Agency  
Erin Curtis, Executive Director, Strategic Growth Council