



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](mailto: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