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State Building Trades, Comments

Please see attached.

Additional submitted attachment is included below.

State Building and Construction Trades Council of California

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Established 1901
Chartered By
BUILDING AND CONSTRUCTION TRADES DEPARTMENT
AFL - CIO

October 26, 2026

California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, CA 95814

RE: SBCTC Comments to ICFAC on Transportation Fuels Assessment Update [Docket#23-ICFAC-01]

The State Building and Construction Trades Council of California, AFL-CIO appreciates the continued opportunity to provide input to the Independent Consumer Fuels Advisory Committee as it works with the California Energy Commission to develop future-looking policy affecting in-state transportation fuels.

It should come as no surprise that our nearly 450,000 members remain concerned about the impact of state policy on in-state fuel production. After the 2025 legislative and special session, California lost two additional refineries. These losses hit the Building Trades hard, as our industrial workforce performs highly skilled contracted out maintenance for construction contractors at these refineries and, in doing so, provides family-sustaining wages to thousands of blue-collar families statewide. Additionally, our members are affected because, by the nature of their work, construction workers are super commuters. Many drive hundreds of miles every week from where they live to where they are working. As in-state refineries close, gas and diesel prices rise, and our members pay the price at the pump[1].

As California refineries close, and our dependence on oil and gas remains relatively stable, our reliance on imports grows. For years, we in the Building Trades have warned that an expanding import strategy is reckless for the already high cost of living in California, its supply, and its climate. Tanking product thousands of miles from places with minimal environmental and labor protections to California, where tankers then idle for days, if not weeks, in California ports, comes at a very high climate cost, much higher than if we produced in-state under the strictest labor and environmental standards in the world.

With the current war in the Middle East, and the resulting congestion at the Strait of Hormuz, an import strategy has translated into skyrocketing costs of consumer fuels, with diesel exceeding $9/gallon in parts of California and the resulting household price impacts due to the high cost to transport every consumer good to market.[2] Every Californian is paying for the policies that led to increased foreign fuel dependence.

The global implications of shrinking production in California cannot be overstated; as *Politico* reported recently, the White House is looking to India to increase imports of refined products to the United States. Beyond the environmental and labor concerns of importing fuel from India, Indian producers are turning to Russian crude to produce the consumer fuels needed by US citizens, undermining national security and diplomatic boundaries.

[1] *The New York Times, "California's High Gas Prices Could Climb Further as Refineries Close", 9/16/25.*

[2] *The New York Times, "$10 a Gallon at This California Gas Station by the Sea"* 10/17/26.

To avoid further global complications, additionally burdened by serious climate concerns, we advise that the Advisory Committee and the California Energy Commission consider urgent action to stabilize California's in-state production and refining by:

1. Working with the Building Trades and existing oil and gas producers in California to ensure that no additional refineries close. This will require a hard look at existing policies that contributed to recent refinery closures, including market cap and minimum supply policies, and consideration of measures to delay further, if not prevent, their implementation.
2. Working with the new Governor to reopen the recently closed Benicia refinery.
3. Working with the executive office and legislative leadership to curtail additional punitive policies that will cause additional refinery closures.
4. Creating long-term legal, policy, and market certainty to the extent possible. Stabilizing the Cap and Invest Program beyond 2045 will be key to creating the stability our existing refiners need to invest in required maintenance of in-state resources.
5. Creating opportunities to reopen in-state extraction capacity. We should leverage the state's vast resources and our skilled and trained workforce to provide the oil and gas products Californians need.
6. Performing a full cycle assessment of the emissions required to use imported oil and gas from other parts of the world. This should include all emissions created from extraction, refining, transport, and delivery to California for foreign derived oil and gas products along with associated emissions from the power grid.
7. Creating policy that allows the State to have input on local air board rules so that there is consistency and coordination of important state policy.
8. Working with municipal governments so that local taxes are not levied that impact fuel prices and supply across the state. Working together, we can limit local policies that drive up costs for every Californian.

The State Building and Construction Trades Council of California stands ready to work with the Advisory Committee, the California Energy Commission, the Legislature, and our new Governor t.o work collaboratively to ensure that California can not only diminish its dependence on foreign fuels but also grow the state's economy and blue-collar workforce.

On behalf of our hard-working, skilled, and trained membership, thank you for your work on this important issue for every Californian.

Sincerely,



Chris Hannan
President