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RE: Comments on the Draft SB 237 Assessment

Dear XX,

The undersigned members of the California Energy Commission's Independent Consumer Fuels Advisory Committee (ICFAC) appreciate the opportunity to provide additional comments on the Draft SB 237 Assessment. These comments reflect the perspectives and expertise of participating subquorum members and are intended to support the development of a transportation fuels transition that is affordable, reliable, equitable, and protective of public health.

The SB 237 Assessment represents an important step in California's transportation fuels planning efforts. While previous work focused primarily on understanding gasoline price volatility and fuel market dynamics, the SB 237 Assessment begins to address a broader challenge: how California should manage the long-term transition away from petroleum dependence while maintaining fuel reliability, protecting consumers, supporting workers and communities, and advancing public health and environmental goals.

We generally support the Assessment's recognition that the transportation fuels transition is not solely an energy or market challenge, but also a public health, environmental justice, labor, and community planning challenge. We also support the Assessment's emphasis on proactive transition planning and governance. The following recommendations are intended to strengthen future assessments and implementation efforts.

Recommendation 1: Incorporate Public Health Metrics Into Future Assessments

The Assessment recognizes that transportation fuel decisions have important implications for public health and environmental justice communities. However, public health outcomes should play a more central role in future transition planning and evaluation. Transportation-related pollution remains a significant contributor to asthma, cardiovascular disease, respiratory illness, adverse birth outcomes, and premature mortality, particularly in communities located near refineries, freight corridors, ports, warehouses, and major transportation infrastructure. These health impacts also create substantial economic burdens through increased healthcare expenditures, chronic disease management costs, lost productivity, and missed work and school days.

We encourage the CEC to incorporate public health indicators into future assessments and transition planning efforts. Metrics such as reductions in pollution exposure, avoided healthcare costs, avoided hospitalizations, improved air quality, and reductions in cumulative environmental burdens would provide a more comprehensive understanding of the benefits associated with transportation fuel transition policies. Public health outcomes

should be evaluated alongside affordability, reliability, and emissions reduction objectives rather than treated solely as secondary co-benefits.

Recommendation 2: Integrate Reliability Planning with Refinery Safety and Community Protection

The Assessment emphasizes the importance of fuel reliability and orderly transition planning. However, future assessments should more explicitly recognize the relationship between refinery safety, operational reliability, worker protection, and community health.

Discussions of fuel reliability often focus on inventories, production capacity, imports, market conditions, and infrastructure constraints. While these factors are important, refinery maintenance practices, operational resilience, workforce expertise, and facility conditions can also influence reliability outcomes. Deferred maintenance, operational disruptions, aging infrastructure, and safety incidents can affect fuel supply, workers, nearby communities, and market stability simultaneously. As California navigates a managed decline in petroleum infrastructure, these risks may become increasingly important to monitor and address.

Stakeholders throughout the transition planning process have emphasized that refinery safety and fuel reliability should not be treated as separate policy issues. Workers often possess firsthand knowledge of facility conditions, maintenance challenges, and operational risks that may not be fully reflected in traditional fuel market analyses. Similarly, communities located near refineries frequently experience the consequences of emissions events, flaring incidents, accidental releases, and other operational disruptions. These events can have significant implications for both public health and fuel system performance.

We encourage the CEC to evaluate reliability through a broader lens that includes refinery safety, maintenance practices, operational resilience, worker safety indicators, environmental compliance, and community health protections. Future assessments could explore how operational conditions, staffing levels, maintenance schedules, and facility age may influence both reliability and safety outcomes over time.

A more comprehensive approach recognizes that safe facilities are often more reliable facilities and that protecting workers and nearby communities contributes to long-term system resilience. Integrating these considerations into reliability planning would help California better anticipate risks, reduce avoidable disruptions, and support a more orderly transition.

Recommendation 3: Advance a Restorative Economic Transition Framework

The Assessment recognizes that refinery transitions may have significant implications for workers, local economies, tax revenues, and community stability. We support the

Assessment's emphasis on proactive planning and workforce considerations and encourage future assessments to expand this discussion through a broader restorative economic transition framework.

Transition planning should not focus solely on replacing jobs or managing economic disruption. It should also seek to create durable economic opportunities, support community resilience, address historical environmental burdens, and improve long-term quality of life for affected communities. Many refinery workers have built careers that provide family-sustaining wages, benefits, training opportunities, and economic security. At the same time, many refinery-adjacent communities have experienced disproportionate pollution burdens and environmental health impacts associated with petroleum production, refining, and transportation infrastructure.

For this reason, the success of the transition should not be evaluated solely by the number of jobs created or retained. It should also be evaluated based on job quality, wage standards, worker protections, career pathways, economic mobility, and the extent to which communities benefit from new investments. A transition that creates employment opportunities but results in lower wages, fewer protections, or diminished economic stability may not fully address the concerns raised by workers and communities.

We encourage the CEC to place greater emphasis on economic diversification, community reinvestment, environmental remediation, infrastructure investment, and strategies that support long-term prosperity in communities affected by refinery transitions. This may include evaluating opportunities for workforce development, apprenticeship programs, remediation and cleanup projects, infrastructure modernization, advanced manufacturing, freight modernization, and other sectors capable of supporting durable economic growth.

A restorative economic transition framework recognizes that workers, refinery communities, and environmental justice communities should not be treated as competing interests. Rather, transition planning should seek outcomes that simultaneously improve economic security, reduce pollution burdens, address historical inequities, and create long-term opportunities for future generations. A successful transition should improve both environmental health and economic opportunity rather than forcing communities to choose between the two.

Recommendation 4: Strengthen Accountability and Community-Centered Remediation Planning

Lastly, the Assessment acknowledges that refinery transitions may create environmental remediation and redevelopment challenges. However, future assessments would benefit from a more detailed discussion of accountability mechanisms and community participation in transition planning.

Many communities that host petroleum infrastructure have experienced decades of environmental and public health burdens associated with fuel production, refining, storage, and transportation. As facilities transition or cease operations, communities should have confidence that environmental cleanup obligations will be met and that redevelopment decisions will be made transparently and with meaningful public participation.

We encourage the CEC to explore approaches that strengthen accountability for remediation and long-term site stewardship, including financial assurance mechanisms, polluter-pays principles, transparency requirements, and opportunities for community engagement throughout cleanup and redevelopment processes. Transition planning should ensure that communities are not left with unresolved environmental liabilities or excluded from decisions that will shape their future economic and environmental conditions.

Conclusion

The SB 237 Assessment provides an important foundation for understanding how California may manage the transportation fuels transition. We support the Assessment's recognition that this transition extends beyond fuel markets and requires consideration of consumer impacts, workforce needs, community resilience, public health, and environmental justice.

As California continues developing its approach to transportation fuels transition governance, we encourage the CEC to strengthen future assessments by incorporating public health metrics, integrating refinery safety and reliability considerations, advancing restorative economic transition strategies, and expanding accountability for environmental remediation and community reinvestment. These efforts can help ensure that California's transition is not only reliable and affordable, but also equitable, transparent, and responsive to the needs of workers, communities, and consumers.

Ultimately, the success of the transportation fuels transition should be measured not only by changes in fuel supply or demand, but by whether California is able to reduce pollution burdens, improve public health, support family-sustaining economic opportunities, protect consumers, and create more resilient communities throughout the state.

Sincerely,