



CALIFORNIA ASSOCIATION OF REALTORS®

October 24, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUBMITTED ONLINE VIA: https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=sp22-recirc-ea-ws&comm_period=1

RE: Comments on the Draft 2022 Scoping Plan Update – Recirculated Draft Environmental Analysis – CONCERN

Dear Members of the Board:

The California Association of REALTORS® appreciates the opportunity to provide comments on the Draft 2022 Scoping Plan Update. We represent over 200,000 REALTORS® along with their clients.

The California Association of REALTORS® understands the need to address the effects of climate change through a variety of different measures, however, we have concerns about the potential impact the implementation of these goals could have on homeownership and the ability to construct new or maintain existing homes for our state's working families.

Enacted almost 15 years ago, AB 32 (Nunez, Statutes of 2006) mandated the Air Resources Board to develop and maintain a scoping plan to achieve the states climate reduction goals. It is imperative however, that such Greenhouse Reduction Goals (GHG) policies ensure that existing homeowners and housing stock are not burdened by costly point of sale and other mandates that could put homeownership out of reach for all but the wealthiest or that would force existing working Californian homeowners severe economic stress forcing them to sell their homes or go into debt simply to hold on to their homes.

We have never had a more diverse and multicultural group of Californians being able to take advantage of homeownership, which is welcome given the discrimination that affected in homeownership opportunities in the past. As we seek to achieve the state's climate goals, we must be mindful not to make housing even less achievable and affordable for our state's underserved and communities who have been historically excluded from home ownership opportunities.

The California Association of REALTOR® greatly appreciates the opportunity to work with the California Air Resources Board Members and their staff. If we can be of any further assistance, please do not hesitate to call on us.

Sincerely,

Jennifer Svec
Legislative Advocate Manager



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