



To: Clerk of the Board, California Air Resources Board

From: 350 Bay Area

Re: Comments on proposal for reducing high-global warming potential (GWP) refrigerant emissions from stationary refrigeration and air-conditioning equipment

350 Bay Area is a non-profit, volunteer organization working for deep reductions in carbon emissions in the Bay Area and beyond. Founded in 2012, 350 Bay Area now represents more than 22,000 people, primarily concentrated in the nine Bay Area counties. 350 Bay Area strongly supports CARB's proposal to adopt into state regulations the US EPA rule provisions relating to prohibitions on certain hydrofluorocarbons (HFC)'s in stationary refrigeration and air-conditioning end uses. This is particularly critical given recent activities by the current U.S. administration to minimize and even reverse efforts by EPA to decrease climate damaging emissions.

350 Bay Area supports the Kigali Amendment to the Montreal Protocol requiring reductions of HFC emissions in developed countries to 85% of 2011-2013 levels by 2036. In 2016, California under SB 1383 adopted a target of 40% of 2013 levels by 2030. Considering the urgency of the climate crisis, the devastating impact of Short-Lived Climate Pollutants, and the importance of California's leadership, we urge CARB to build into its planning the Kigali Amendment target. The current process should evaluate potential regulations based on the likelihood of progress toward meeting the goal set for 2036 by the global community.

It seems from the workshop notice that CARB will focus only on prohibition of specific high-GWP HFCs in new retail food refrigeration, food dispensing equipment, air-conditioning chillers, and refrigerated vending machines. There is no apparent plan to address restrictions on high-GWP HFCs used in residential refrigerator-freezers, motor vehicle air-conditioning, insulating foam, and aerosol propellants as proposed in US EPA's rules 20 and 21. Is CARB proposing to address these sources in separate proceedings? If so, what is the process/timeline? If not, what is the missed opportunity of not including these substantial sources? We urge CARB to be creative in exploring approaches to mitigate these additional substantial sources of HFC's.

Cate Leger

Building Decarbonization Lead