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Edwin A. Lombard III

June 24, 2021

Chair Liane M. Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CARB Board Scoping Plan 2022 Agenda Item 21-5-4

Dear Chair Randolph:

Californians are all too familiar with the effects of climate change, and the record heat, massive wildfires, and rolling blackouts of Summer 2020 quickly come to the top of mind. That said, California's leadership is pursuing solutions that could do more harm than good if we maintain a one-track mind rather than face potential pitfalls and make sure we have a diverse, sustainable, and affordable plan.

As we work towards a future in renewable energy, it is worth considering whether we are better prepared today to avoid previous disasters. Unfortunately, it isn't easy to provide a specific answer.

As it stands, it appears that California's regulatory leadership – particularly the Air Resources Board – has a disturbing lack of empathy for its struggling residents. Our energy policies should not punish blue-collar, middle-class families or vulnerable, low-income families, especially in a state with one of the nation's highest poverty levels.

Environmental Lobbyists representing environmental activist groups do not speak for all communities of color or minority small businesses. These lobbyists represent a narrow view of what they believe is good for our communities. And unfortunately, these are the only community voices that CARB seems to be interested in hearing from.

The Environment Justice Advisory Committee has been a bully pulpit and a microphone as part of this process. I don't mean to imply that they don't deserve a voice. But they only represent a single point of view. And like our community, our perspectives are diverse. Keep in mind that there are no business entities represented on this committee. In the state of California, 95% of all business is small business. And the majority of those businesses are minority small businesses which mean they are micro-businesses.

Air quality improvements are essential. But so are other things. CARB should also consider what different segments of low-income communities and small businesses are asking for. CARB's process should seek to identify voices and viewpoints beyond environmental activists. What will the community engagement process look like beyond reaching out to the environmentalist?

CARB should designate a group that is not just focused on environmental extremism (which is what we're seeing as the representatives from EJAC seem to all think alike. And that appears to be a prerequisite to be a part of the group. And their views are extreme.)

There is no denying that California's leaders, businesses, and individuals must work together to fight climate change. But some proposed policies continue to make income inequality worse, as regulators toss out new deadlines – like the ban on traditional cars, trucks, and hybrids set for 2035 – without proper determination of how much it will cost taxpayers and ratepayers. An inclusive energy policy will not widen the poverty gap.

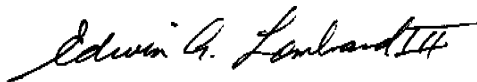
High costs aside, we have also added another burden on our most vulnerable – the return of rolling blackouts and more shutoffs to come. Last summer, when California already did not have enough power to keep the lights on, coupled with a relentless fire season and the pandemic, left some of our most vulnerable neighbors without power. The loss of power directly put their lives at risk.

If we are serious about tackling issues like institutional racism, the economic divide, and climate change, we need to take meaningful steps forward to energy policies. Minority small businesses suffer the most during COVID-19. Over 41% of all Black-owned businesses were lost and may never come back due to the pandemic. These voices should have a seat at the table when it comes to climate change.

We cannot singularly focus on electrification without regard for those who cannot easily afford the projected rise in utility bills or vehicle costs. People of color have taken the brunt of COVID pandemic impacts, and their continued wellbeing is reliant on us taking action. As such, our policies must not continue to widen the economic divide and must seek an environmentally and racially just transition.

Please consider changing the makeup of the Environmental Justice Advisory Committee to include both small businesses and labor.

Most Sincerely,

A handwritten signature in black ink, reading "Edwin A. Lombard III". The signature is fluid and cursive, with the last name "Lombard" being more prominent.

Edwin A. Lombard III
President/CEO