

24 June 2022

Concerns about the CARB Public Comment Process

Dear members of the CARB Board and Staff,

First of all, thank you for the work you do to protect California's people and environment and to set the state on a course toward a more environmentally just future. We are writing to express some concerns about the procedures surrounding the submission of spoken public comments at CARB hearings.

We were present at the hearing yesterday (Thursday, June 23rd) on the 2022 Scoping Plan. We were troubled by the presence of what appeared to us, and to several others in the hearing room with whom we spoke, to be representatives of front-groups claiming to be voicing their personal perspectives while reading generic, pre-scripted public comments.

From my vantage-point, I could clearly see that the members of a certain group were all reading from pages of text printed in the same font (same style, same size), and several of them delivered their comments haltingly, as if they were reading sentences that they were scarcely familiar with.

We were also frustrated by the sheer number of in-person public comments made by members of these groups – perhaps something like 15 to 20, in the case of two of the groups. They seemed intent on dominating the discussion by means of volume of comments made.

We recognize that it would be next to impossible – and problematic from a standpoint of the democratic process – to filter public comments. We wonder, however, if it would be possible to enact a common-sense measure like a cap on the number of comments that can be offered by a single group at a given hearing? And perhaps a cap on the number of comment cards that can be submitted by a single individual at the desk outside the hearing room?

To be clear, we have no desire to silence the voices of any stakeholders in California's future. We simply wish to see a true diversity of perspectives represented in the CARB hearing room, to avoid having the public comment process overwhelmed by any group seeking to dominate the discussion by "gaming the system" of submitting signup cards, and to ensure that those making comments actually speak for the people they claim to represent.

Sincerely,

Daniel Larlham, on behalf of Extinction Rebellion SF Bay;
Ralph King, on behalf of Silicon Valley Climate Action Now.