

From: [karen kirschling](#)
To: [ARB Clerk of the Board](#)
Subject: Re: Notice of Public Hearing to Consider Proposed Amendments to the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants and Foam End-Uses
Date: Monday, December 7, 2020 10:30:30 PM

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Please choose Alternative 1, the most effective measure against high-GWP refrigerants.

The proposed rules you are currently considering would require new supermarkets to use natural refrigerants, but existing stores would only need to reduce GWP per pound to 1,400 (1,400 times more potent than CO₂). According to your own staff report, this would result in about a 25 percent cut in emissions by 2030, but no further cuts after that time. This schedule obviously conflicts with the state's commitment to net zero emissions by 2045.

I am writing to express my strong preference for "Alternative 1," which would convert the entire system of supermarket and other large refrigerators to natural refrigerants with a GWP of 10 or less (ammonia or CO₂, for example).

Alternative 1 could be improved and made more accessible by adding incentives or tax breaks for stores in disadvantaged areas.

What you are proposing is a half-measure. Please drop it in favor of the much more effective Alternative 1, and stay on target for net zero emissions.

Sincerely,
Karen Kirschling
San Francisco, CA