



21 June 2022

Re: Accelerate Building Electrification in the CARB Draft Scoping Plan

The [San Diego Building Electrification Coalition](#) (SDBEC) is an alliance of community, business, faith, justice, and environmental organizations coming together to accelerate electrification in residential and commercial buildings.

SDBEC supports practical, immediate actions using affordable renewable energy technology to equitably cut carbon emissions in buildings to address the urgency of our climate crisis. We oppose the use and expansion of methane gas hookups due to the adverse impacts of methane gas combustion on Greenhouse Gas (GHG) emissions, indoor health, and public safety.

Unfortunately, the CARB 2022 Draft Scoping Plan has recommended Alternative 3, which is neither immediate, delaying net zero emissions until 2045, or practical, relying on expensive and unproven carbon capture, usage, and sequestration (CCUS). It also perpetuates California's reliance on fossil fuels and the danger this poses to our health and environment. Research for the CEC indicates that building electrification is likely to be the lowest cost and lowest risk option for decarbonizing California's building sector.

We urge CARB to pursue a much more ambitious approach to decarbonization, in line with Governor Newsom's request to accelerate our state's climate action timeline to achieve carbon neutrality by 2035.

SDBEC supports inclusion of the following measures for earlier, more rapid, and more holistic electrification strategies in buildings:



1. Accelerate the phase-out of gas appliances

All commercial and residential new construction should be all-electric in 2026 to align with the next Title 24 code cycle.

To support the transition to electric appliances, and minimize the scale of early retirements, CARB should accelerate the phase-out of new fossil-fueled appliances by requiring existing residential and commercial appliance sales be 80% electric by 2025 and 100% by 2030.

In addition to replacement of gas appliances at end-of-life, we ask CARB to incentivize retrofits *before* end-of-life to protect customers from loss of service upon burnout, to better plan the transition away from gas to electric, and to support electrification efforts and their corresponding climate and public benefits.

Rebates and incentives for gas appliances should be immediately terminated.

2. Ensure a full decommissioning of the gas distribution system by 2045.

We urge CARB to include explicit planning for the strategic decommissioning of the gas infrastructure system by 2045. Efforts to extend the use of methane by blending hydrogen into our gas pipes or relying on CCUS for decarbonization is not a climate solution. A deliberately planned transition away from the gas system, supported by mitigation strategies, is needed to reduce future gas system spending and manage gas rates and risks for customers. Continuing to maintain an aging fossil gas system that is destined to be shut down is costly and poses undue hazards for our communities.



3. Prioritize an equitable transition for vulnerable neighborhoods

The policy approach described in the Draft Scoping Plan Appendix D (Local Actions) must go further. A truly holistic approach would package decarbonization with energy efficiency, indoor air quality, and resiliency measures; and expand critical programs that offer energy efficiency and solar PV at no cost to communities of concern.

We support these additional actions from the Building Energy Equity and Power Coalition (BEEP):

- Fully fund building decarbonization and debt relief programs for low-income communities and communities of color to reduce energy burdens and remove cost barriers. Energy costs should go down after projects are complete, and low-income households should not have to pay anything out of pocket. Educate ratepayers on cost impacts and best practices for energy use.
- Work with local tenant rights groups to embed renter safeguards in every building decarbonization policy and program, and clearly identify enforcement mechanisms and resources. Close loopholes in state law on this issue.
- Provide funding for more training, education, technical assistance, and financial incentives (e.g., align Tax Credit Allocation Committee funding with state sustainability goals) for affordable housing providers to implement decarbonization in new and existing buildings. All affordable housing should be all-electric.
- Ensure job access for local and priority populations underrepresented in highroad construction jobs, such as through community workforce agreements.



4. Additional Building Decarbonization Policies

The CARB 2022 Scoping Plan should include these policies from its Appendix F (Building Decarbonization):

- Develop zero-emission standards for appliances to reduce NOx emissions.
- Require new and renovated state buildings to be all-electric construction instead of Zero Net Energy.
- Adopt policies to reduce embodied carbon associated with building materials.

SDBEC urges CARB to incorporate the above measures into the Final 2022 Scoping Plan. The imperative to act now, using proven means and sound planning, far outweighs the cost of delaying emissions reductions another ten years. To use CARB’s own words, “... this is [our] greatest existential threat.” CARB needs to act accordingly.

Sincerely,



Ann Feeney
Strategy Committee Chair
San Diego Building
Electrification Coalition



Colleen FitzSimons
Executive Director
San Diego Green Building
Council






Luke Stroth
Green New Deal at UCSD



 <p>Susan Wayo Board Member & Secretary Center for Community Energy</p>	 <p>The Climate Reality Project SAN DIEGO CHAPTER</p> <p>Leslie Gomez San Diego Climate Reality Project</p>	 <p>Matthew Vasilakis Co-Director of Policy Climate Action Campaign</p>
 <p>Jim Miller Vice President AFT 1931</p>	 <p>FORWARD DINING SOLUTIONS LLC PUSHING SUSTAINABLE KITCHEN DESIGN FORWARD</p> <p>Chef Christopher Galarza, Founder Culinary Sustainability Consultant Forward Dining Solutions LLC.</p>	<p>North County</p>  <p>Marian Sedio Board Member North County Climate Change Alliance</p>
 <p>Sean Armstrong Managing Principal Redwood Energy</p>	 <p>The Protect Our Communities FOUNDATION</p> <p>Tyson Siegle Energy Analyst The Protect Our Communities Foundation</p>	 <p>SAN DIEGO COASTKEEPER</p> <p>Lucero Sanchez Community Policy Coordinator San Diego Coastkeeper</p>
 <p>Kelly Lyndon Co-chair Building Electrification San Diego 350</p>	 <p>Solutions in Sustainability</p> <p>Alex Kaufman PE CEM Founder Solutions in Sustainability</p>	 <p>American Institute of Architects San Diego</p>



<p>CLIMATE JUSTICE  Climate Change is a Moral Issue First Unitarian Universalist Church of San Diego</p> <p>Rhea and Armin Kuhlman Co-Chair, Climate Justice Team First Unitarian Universalist Church of San Diego</p>	<p> EMERALD KEEPERS Amy Steward Executive Director Emerald Keepers</p>	<p>FUTURES <i>unbound</i></p> <p>Peter Zahn, CEO Futures Unbound</p>
<p> Suzanne Hume Educational Director & Founder CleanEarth4Kids.org</p>		

