



Docketed in draft2022statesip-ws

March 4, 2022

California Air Resources Board
1001 I St #2828
Sacramento, CA 95814

Re: Building Decarbonization and the 2022 State Implementation Plan

Chair Randolph and Board members:

On behalf of Natural Resources Defense Council, Building Electrification Institute, Association for Energy Affordability, Earthjustice, RMI, Sierra Club, and New Buildings Institute, we write to express support for the Air Resources Board's (ARB) proposed measure to require zero-emission space and water heating appliances by 2030. However, this measure can only accomplish the SIP goals equitably if it is accompanied by protections and support for low-income and environmental justice communities. Specifically, we ask that ARB work with community-based organizations directly engaged with low-income households to develop and adopt a concrete implementation plan that will prioritize and uplift low-income and environmental justice communities through this clean energy transition.

The State Implementation Plan (SIP) appropriately recognizes the urgency and need for rapid and widespread deployment of electric heat pumps to meet California's climate and air quality objectives. The proposed standards will help attain state and federal air quality standards by substantially reducing emissions of ozone- and particulate-forming nitrogen oxides (NO_x). This is essential, especially as 87% of Californians live in counties that are in nonattainment with federal ozone and/or PM_{2.5} standards.¹ Emissions standards are key to addressing greenhouse gas

¹ Yifang Zhu et al., *Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California* 37, UCLA Fielding School of Public Health (Apr. 2020), <https://ucla.app.box.com/s/xyzt8jc1ixnetiv0269qe704wu0ihif7>.

(GHG) emissions and other pollutants—impacting not only new buildings, but existing buildings as well. While additional strategies to transition away from gas dependence, such as geographically-targeted electrification as raised in the February 10th SIP workshop, are also important, they do not supplant the need to transition to zero-emission appliances in all buildings to meet California’s climate goals.

As we make the transition to zero-emission technologies, we must prioritize low-income and environmental justice communities. Targeted funding for the adoption of clean appliances can provide public health, affordability, and quality of life benefits to communities that need these benefits the most. Highly efficient heat pumps in particular can lower energy bills, improve indoor comfort and resilience to extreme heat, and protect from hazardous air caused by wildfire smoke and pollution. In a study by UCLA, it was found that if all residential gas appliances in California were replaced with clean electric alternatives, the reduction in outdoor air pollution would avoid about 350 deaths, 600 cases of acute bronchitis, and 300 cases of chronic bronchitis each year. These substantial health benefits translate to about \$3.5 billion in annual monetized health benefits.²

We support ARB’s ambition to use their authority to establish a first-in-the-nation appliance standard. However, we urge the ARB to clarify in the SIP draft how low-income and environmental justice communities will be prioritized in the appliance transition by detailing how they will work with communities, stakeholders, and state decisionmakers to meet the following [goals](#):

1. Ensure that zero-emission appliances are available at affordable or no upfront costs for low-income and disadvantaged households and residents, with a prioritization for California’s disadvantaged communities as identified through CalEnviroScreen 4.0.
2. Ensure that zero-emission appliances can be operated at costs that do not increase energy burden for low-income or disadvantaged households.
3. Ensure enforceable anti-displacement and renter protections.
4. Support the necessary housing upgrades to enable the installation of zero-emission appliances.

We recommend that ARB adopt checkpoints between now and 2030 to ensure that these goals are met and that environmental justice communities lead and are prioritized when evaluating these checkpoints. We appreciate and support ARB moving to develop these measures with “careful consideration for community needs, and housing cost concerns, with full community

² Yifang Zhu et al., *Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California* 39, UCLA Fielding School of Public Health (Apr. 2020), <https://ucla.app.box.com/s/xyzt8jc1ixnetiv0269qe704wu0ihif7>.

engagement,” and urge ARB to work with stakeholders to create a comprehensive roadmap to meet the aforementioned goals and equitably decarbonize California’s buildings.

We also want to recognize the importance of uplifting leadership from local and regional community organizations, governments, and air districts that are currently leading on equitable building electrification. It will be important to ensure there is coordination between local and regional efforts and a broader statewide effort to provide the support necessary for this equitable appliance transition.

We are strongly supportive of a transition to all-electric new appliances, which is critical to meeting the state’s air quality, health, and climate goals and to make progress in regions that are in nonattainment. If well-managed, the transition can also deliver affordability, grid reliability, and equity benefits to all Californians. Therefore, we urge CARB to develop a detailed strategy to meet the 2030 emissions standard in a way that helps remedy the patterns of historic disinvestment in under-resourced low-income and disadvantaged communities.

Dated: March 4, 2022

Sincerely,

A handwritten signature in black ink, appearing to read "Kiki Velez".

Kiki Velez

Natural Resources Defense Council

A handwritten signature in blue ink, appearing to read "Jenna Tatum".

Jenna Tatum

Building Electrification Institute

A handwritten signature in black ink, appearing to read "Andrew Brooks".

Andrew Brooks

Association for Energy Affordability



Fernando Gaytan

Earthjustice



Leah Louis-Prescott

RMI



Nihal Shrinath

Sierra Club



Ralph DiNola

New Buildings Institute