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EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



January 21, 2022

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

**Re: Comments on the 2022 Scoping Plan Update - Building
Decarbonization Workshop**

Dear Chair Randolph:

Bay Area Air Quality Management District (Air District) staff supports the framework presented during the *2022 Scoping Plan Update - Building Decarbonization Workshop*. Residential and commercial buildings are responsible for roughly 25% of California's greenhouse gas (GHG) emissions, and as discussed under the AB 3232 Assessment Conclusion's scenario analysis, aggressive electrification will be required to meet the state's goal of achieving carbon neutrality by 2045. All State agencies including the California Air Resources Board (CARB) must take bold action to decarbonize the building sector.

A critical step toward achieving building decarbonization is to remove natural gas combustion from existing buildings. As proposed in CARB's Fall 2021 discussion document for the 2022 State SIP Strategy, a zero-NOx and carbon limit that would apply to sales of all new space and water heaters starting in 2030 would significantly reduce GHGs and improve air quality and health outcomes for people living in California. In addition to carbon dioxide, methane and nitrogen oxides, leakage and combustion of natural gas in buildings releases toxic air contaminants, carbon monoxide and particulate matter, creating indoor and outdoor pollution that significantly degrades air quality and threatens public health.

The Air District is committed to decreasing building emissions throughout the Bay Area region. In this pursuit, the Air District is currently developing proposed amendments to our Rules 9-4 and 9-6 for residential and commercial space and water heating appliances. Current draft amendments to these Rules include a zero-NOx emissions standard at the point-of-sale. Air District Staff is planning to present the amended rules to our Board for approval later this year. A statewide policy limiting NOx and carbon emissions from space and water heating would significantly expand the market for low-emitting appliances by sending a strong market signal and helping to drive down costs for zero-emission space and water heating technologies.

More than 50 local governments in California have adopted local building policies limiting or banning the use of natural gas in new development; most of these jurisdictions are in the Bay Area. Several of these local governments are now considering potential codes or requirements aimed at existing buildings. Most local governments are resource-constrained and lack the technical expertise to draft policies needed to address emissions from the existing building stock. A statewide policy accelerating the transition to zero-emission space and water heating, as proposed by CARB, would enable cities and counties to focus their attention and limited resources on complementary policy areas where they have more expertise-- such as permit streamlining, community outreach, displacement prevention and housing affordability.

While building decarbonization is critical to the State's progress on meeting climate goals, it is imperative that policy address cost and equity impacts. We urge CARB to carefully consider potential equity outcomes of building decarbonization, such as how moving toward electrification might impact lower income households and frontline communities. Accounting for, and identifying solutions for, these potential impacts, and working with other state agencies and communities to develop adequate funding and financing programs to support building decarbonization will be critical moving forward.

The Air District fully supports electrification across the state as presented during the *2022 Scoping Plan Update - Building Decarbonization Workshop* and looks forward to collaborating in our shared pursuit of decreasing building emissions. For further information on the Air District's Building Decarbonization Program, please contact Senior Environmental Planner Amy Dao, at adao@baaqmd.gov.

Sincerely,



Jack P. Broadbent
Executive Director/APCO

cc: BAAQMD Secretary Davina Hurt