

June 24, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814
By Email and Online

Re: BEEP Coalition Scoping Plan Comments

Dear Members of the California Air Resources Board:

We are writing to you as members of the Building Energy, Equity and Power (BEEP) Coalition to submit formal comments to the draft Scoping Plan. The BEEP Coalition currently includes representatives from Self-Help Enterprises; PODER; the Center on Race, Poverty & the Environment; the Central Valley Air Quality Coalition; Leadership Counsel for Justice & Accountability; Local Clean Energy Alliance; and Physicians for Social Responsibility-Los Angeles. The Coalition has been engaging with the AB 32 Environmental Justice Advisory Committee and CARB staff on this topic throughout the Scoping Plan development process to-date and we appreciate the opportunity to memorialize those conversations and related recommendations in this letter.

The BEEP Coalition represents environmental justice communities in various parts of the state. We formed for a simple reason: low-income communities and communities of color are being left behind in conversations about building decarbonization. We have previously sent you our Preliminary Report, [“Community Priorities for Equitable Building Decarbonization.”](#) as a call to action to invest in the real, equitable, community-driven solutions we know will work to ensure rapid decarbonization and increased resiliency in the communities who need to see those benefits the most. The recommendations included in the Preliminary Report are developed directly from community input heard in regional listening lessons in the San Joaquin Valley, Los Angeles County, San Francisco Bay Area, and East Coachella Valley. These communities are already bearing the brunt of the effects of climate change and they deserve real solutions that meet their unique needs.

The BEEP Coalition recommends that CARB form an interagency working group to work with communities to identify and address barriers to equitable building decarbonization prior to adoption and implementation of any appliance, indoor air quality, or building standards. We recognize and appreciate the sense of urgency to move forward on standard-setting now, and in general, we recognize the health, climate, and environmental benefits that equitable building decarbonization can provide. However, we also know from our direct work in frontline communities that the barriers and risks of moving forward on those standards, before appropriate funding and policy solutions are in place, are significant and

cannot be ignored - particularly for low-income communities and communities of color already overburdened by economic and environmental challenges with no capacity for any cost increases or displacement risk.

The Preliminary Report highlights concerns across program design and access, costs, and affordability, among other cross-sector issues. For example, requirements for home ownership documentation and other legal documents (only available in English) are existing barriers to program participation. Additionally, residents without existing appliances to replace (like air conditioning units) or without access to natural gas are ineligible for many programs to access cleaner, efficient appliances. Further, many low- and middle-income households are considered ineligible to access current financial assistance programs and program income thresholds don't always cover families struggling to make ends meet. For many communities across California, these conditions are reflective of historical and ongoing lack of engagement and investment in their communities, which means that these communities will need specific, tailored solutions to help meet the state's decarbonization goals.

The working group would work collaboratively to identify funding and policy solutions to critical issues that, if addressed, would allow BEEP and other environmental justice stakeholders to engage fully in discussions around equitable building electrification, appliance standards, and upgrades that benefit the health and safety of community members.

This working group should, at a minimum, include members of the BEEP Coalition and representatives from CARB, the California Energy Commission, the California Public Utilities Commission, the California Department of Community Services & Development, and the California Business, Consumer Services and Housing Agency.

The following issues should be prioritized in such a working group, as outlined in our Preliminary Report and based on feedback from hundreds of stakeholders from across California:

1. Stronger tenant protections to ensure that loopholes in state and local law are closed. Tenants should be able to access programs without fear of untenable rent increases or being permanently displaced for these improvements. The state also needs to identify a robust enforcement mechanism that includes trusted community-based organizations for upholding these protections.
2. Equitable funding mechanisms that include direct community grants, equipment and installation incentives, rate reform, debt relief, and bill protection to enable no-cost improvements for low-income households. These mechanisms would include aligning existing incentives and cross-sector retrofit funding to enable holistic building upgrades to happen simultaneously. This also includes aligning affordable housing funding and technical assistance so nonprofit developers can implement decarbonization for new and existing buildings.
3. Partnerships with local groups to facilitate planning, outreach, and education efforts, similar to the model used in the San Joaquin Valley Affordable Energy Pilots. Engaging with local groups is critical to ensuring that trusted advisors are responsible for enrolling, educating, and supporting community members as they decarbonize. Regional

approaches will be needed as there is no blanket solution that can meet the diverse needs of California's communities and local groups have the expertise and relationships necessary to ensure that all communities across the state are decarbonizing.

4. Regulatory and policy alignment to ensure ratepayers are not negatively impacted by these improvements or policies over time, and to address potential hurdles like “obligation to serve” and other hurdles that may hamper statewide decarbonization efforts.
5. Workforce alignment to ensure frontline communities can access and benefit from new job opportunities. This includes exploring community workforce agreements, as well as public coordination of projects to ensure high-road job standards are upheld.
6. Supply chain issues related to the recycling and clean-up of natural gas infrastructure, as well as the potential impacts of lithium extraction. Communities in the Eastern Coachella Valley have expressed their interest in research about the short- and long-term impacts of lithium extraction at the Salton Sea, and how to build in protections that will ensure frontline communities benefit from that activity.

The BEEP Coalition further recommends that CARB reserve funding for community engagement and CBO-led research in this work. We initiated the process behind our Preliminary Report to help respond to the Scoping Plan process, but were only offered \$5,000 by CARB to help offset our expenses. That level of funding was completely insufficient to compensate for the time of frontline community organizations and residents, so we pursued private funding to enable us to complete the listening sessions and corresponding report. Recently, we became aware of [a \\$450,000 research solicitation from CARB](#), using *our* Preliminary Report as the foundation for that project - with absolutely no requirements that any funded entity partner with or compensate us for the role we would need to play in that project. To set aside \$450,000 for academics to do the work that we were only offered \$5,000 to complete is an insult to [environmental justice principles](#) and the essential experience, community relationships, and expertise the BEEP Coalition partners offer to this process. CARB should reallocate the \$450,000 for the project to enable BEEP to continue our research and engagement, or identify an additional \$450,000 from another budget.

If you have any questions about our position, please do not hesitate to reach out to us. Thank you for your time and consideration of these comments.

Sincerely:

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