



June 24, 2022

Dear CARB,

The City of Hayward appreciates the opportunity to provide a formal statement regarding the Air Resources Board Scoping Plan. We have reviewed the Plan and are supportive of the broad concepts, initiatives, and goals set forth in this vital proposition. However, the City wishes the Plan went a step further in reimagining how we measure success beyond GDP, using more equitable measures such as health, as well as envisioning a future where we truly transform our lived places to be more sustainable, leading to a much lower reliance on unproven technologies like carbon capture.

Overall, the Scoping Plan is well conceived, comprehensive, and lays out a strong foundation from which there is room for expansion and improvement. We generally agree with the strategies and actions listed in the plan, but that the list is incomplete. The focus on cost effectiveness as the primary criteria does the process a disservice, and we propose using alternative methods of strategy evaluation. We believe it is the only way to reach carbon neutrality.

As the City of Hayward has established its position of general support for the Plan, the City is also interested in strengthening certain parts of the Scoping Plan. While we thank and support CARB's acknowledgement of funding and capacity challenges in developing GHG inventories and climate action plans (CAPs) in local jurisdictions or implementing GHG reduction strategies, we have some significant concerns with the document's ability to be implemented, financed, and acted upon at the local level. The Plan should more thoroughly describe how the state will provide the capacity building, funding and technical assistance that is critically needed by local governments to carry out all of the many strategies listed in the Plan's Appendix D. In addition, it remains unclear how CARB will meaningfully and effectively prioritize disadvantaged communities and communities of color to ensure equitable access to resources and support.

There are many challenges to be navigated in this endeavor, specifically how programs will be designed and delivered. Below are more detailed comments with regards to the City's climate priorities:

1. **Transform the economy** instead of inserting technologies into broken economic systems
2. Choose economic indicators that **measure equitable progress**
3. **Work with local communities** within their contexts and priorities
4. **Less reliance on unknown and uncertain carbon capture technologies** that allow the State, and therefore local governments, to continue business as usual, causing disadvantaged communities to continue to bear the heaviest burden of climate change impacts

Additionally, the City reviewed several appendices. Below are more detailed comments:

Appendix D – Local Actions:

- We **strongly support** the GHG reduction strategies related to building decarbonization, transportation electrification and VMT reduction (Table 1). We would also **recommend including sequestration as a fourth strategy**, with local actions to include urban greening, prioritizing green space, etc.
- We **strongly support** the project attributes that reduce GHGs (Section 3.2), with a further **recommendation to include on-site energy storage and distributed energy resources to support electrification and resilience.**

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- We reemphasize that capacity building, funding and technical assistance is critically needed by local governments to carry out all of the many strategies listed in this appendix.
- We **recommend** including language that CARB would promote, support and/or assist in the **development of regional support networks and approaches to address resource inequity for tasks such as the development of GHG inventories and CAPs**. This may include direction of local Councils of Government (COGs) or Associated Governments (AGs) to develop regional GHG inventories and CAPs, as well as lead coordination on regional VMT reduction strategies. We also would **recommend CARB lead the development of a regional and/or statewide bank for local off-site GHG mitigation projects that include community co-benefits**.
- Local governments would benefit from a tool developed by CARB to quantify sequestration benefits.

Appendix E – Sustainable and Equitable Communities:

- Appendix E is titled Sustainable and Equitable Communities. However, this title is misleading and **should be Transportation and Land Use**. While it is appreciated that there was an effort to weave equity into Appendix E, it is missing large sectors that are inclusive of sustainable and equitable communities. If Appendix E truly wants to represent Sustainable and Equitable Communities, **the following need to be added**:
 - Economic Development
 - Repurposing Existing Infrastructure & Stranded Assets
 - Building Decarbonization
 - Urban Forestry
- Additionally, if Appendix E's main purpose is to focus on equity, it is insufficient in meeting its goal as is. **Equity needs to be interwoven and considered with every single objective and action within Appendix E and every other appendix**.
- We **recommend** adding tree planting requirements along active transportation routes to provide shade, as well as carbon sequestration opportunities.
- We **recommend** measures be included to ensure any incentive/rebate programs are equitably distributed. These measures could include pilot programs rolled out first to allow opportunities to address any unintended consequences, especially to low-income communities and communities of color.
- We strongly encourage transportation and new mobility options focus on the integration and accessibility of public transit and active transit first, and then supplement with ZEV options.

Appendix F – Building Decarbonization:

- The state must continue to set **aggressive standards for new construction** and establish expectations for existing buildings to decarbonize in alignment with state goals. Potential actions that support this:
 - Adopt zero-emission building standards for new construction in CALGreen.
 - Support local leadership by developing and supporting voluntary model building standards, for example in CALGreen, that support decarbonization and can be easily adopted by local governments
 - Develop building performance standards (BPS) that builds on CA Building Energy Benchmarking Program. Create specific incentives to help offset costs for building owners unable to cover costs needed to either meet a performance standard or perform underlying structural and safety upgrades.

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- In conjunction with efforts to eliminate emissions from new construction, many coordinated activities will be needed at the state, regional, and local levels to facilitate an equitable and complete transition away from natural gas in existing buildings, neighborhoods, and entire cities within the next two decades. In particular, support **local gas system decommissioning planning**. Potential actions that support this:
 - Redirect resources away from investments that incentivize gas demand, and toward aligned public investments that accelerate building electrification.
 - Provide incentives for strategic pruning of the gas system (i.e., outreach programs to electrify all of the homes or businesses in a particular location that would allow for the gas lines serving that neighborhood to be capped and retired.).
 - Accelerate the development and adoption of 2022 State Strategy for the State Implementation Plan (SIP) draft measure for a statewide zero-emission GHG standard for new space and water heaters sold in California. (2028 instead of 2030)
 - CPUC should remove all non-cost-effective natural gas appliance energy efficiency measures from ratepayer funded energy efficiency programs within current proceedings for 2024-2028 cycle.
 - Pass legislation to allocate general fund taxpayer revenues to remove existing ratepayer expenses, such as wildfire mitigation plans, to lower electricity bills for all ratepayers in order to make electrification a more financially enticing prospect from a bill impact perspective.
- State support for achieving complementary goals of decarbonization, supporting health and well-being, and serving those most in need could help move these efforts to the forefront. Creating an efficient referral system between health-focused programs and decarbonization incentive programs is a start.

We applaud CARB on this extensive process to chart a path forward toward carbon neutrality. We encourage CARB to take this opportunity to embrace an inspiring vision of what a carbon neutral California can look like. The vision can be one that improves the quality of life for all Californians and helps to undo past harms and disproportionate impacts on historically oppressed and excluded populations and creates economic systems that serve communities (inverting the current tendency for communities to primarily serve the economy as measured in GDP). If our vision only includes clean technologies, we could envision all Californians having heat pumps and electric vehicles but still unable to afford the energy to power these, or even unable to afford adequate housing and basic necessities. We believe the state has a bigger, healthier vision than this. Articulating that vision and having it guide our climate work is critical to galvanizing all of the parties that will need to collaborate to achieve a thriving and carbon neutral California.

Sincerely,

Barbara Halliday
Mayor

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