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Connect with the
Bay Area Air District:



December 2, 2020

Governor Gavin Newsom
State Capitol
1303 10th Street, Suite 1173
Sacramento, CA 95814

RE: All-Electric Buildings for the 2022 Building Energy Efficiency Standards Update

Dear Governor Newsom:

The Bay Area Air Quality Management District (Air District) is writing to request that you urge or direct the California Energy Commission (CEC) to require all-electric new construction in the 2022 Building Energy Efficiency Standards (Energy Code). Acting quickly to eliminate natural gas use in new buildings is a critical step to meeting statewide goals for climate protection, air quality, and environmental justice. The leadership you demonstrated by signing Executive Order N-79-20, requiring all cars and trucks sold in California to be zero-emission by 2035, is also needed for the buildings sector.

The Air District, the air pollution control agency for the nine counties of the Bay Area, is committed to advancing regional and state greenhouse gas reduction goals. In 2017, the Air District published *Spare the Air, Cool the Climate*, a regional clean air plan that serves as a blueprint for moving the Bay Area toward a post-carbon economy and eliminating disparities in health risk from air pollution. Supporting building electrification is a top priority of the Air District as it contributes to achieving both of these essential goals.

Natural gas use from residential and commercial buildings in the Bay Area represents approximately 11 percent of the region's greenhouse gas inventory. Natural gas use in buildings will have to be significantly reduced in order for the state to meet its climate goals. Switching from natural gas to nearly carbon-free electricity in the building sector is a critical component of the Air District's climate protection strategy. The next Energy Code the CEC adopts will apply to buildings constructed between 2023 and 2025. Without ambitious state mandates for building electrification, these buildings will continue to extend the natural gas infrastructure and support use of natural gas well beyond the state's target years for achieving carbon neutrality (2045) and reducing greenhouse gas emissions by 80% (2050).

More than 90% of California households use natural gas, producing emissions of nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide, and toxic formaldehyde that pollute both inside and outside the home. Indoor air quality is mostly impacted by kitchen appliances, with outdoor air quality impacted by space and water heating that vents outdoors. There is a growing body of research demonstrating acute and chronic health effects from exposure to indoor air pollution. Researchers at the UCLA Fielding School of Public Health recently released a report focused on the impacts of residential natural gas appliances on

indoor and outdoor air quality and human health, and potential benefits of widespread residential electrification. Reducing NOx and PM emissions outdoors will help the region and state attain health-based ambient air quality standards for ozone and PM_{2.5}. An all-electric 2022 Energy Code would improve air quality and health outcomes for the residents of California.

There are important equity implications in the state's continued tolerance of natural gas in new construction. Residents of vulnerable and disadvantaged communities are at higher risk of exposure to unhealthy levels of indoor and outdoor air pollution, as they disproportionately experience poor housing conditions, including old and unmaintained gas appliances, and are often located closer to sources of air pollution. Lower-income families are often renters who may not have control over appliance replacement and maintenance. A key priority of the Air District is to reduce emissions and exposure to air pollution in the region's most vulnerable communities that are overburdened by pollution. Eliminating natural gas use in new development will support these efforts and advance the objectives of environmental justice statewide.

In the absence of state leadership on this issue, it has been left to local governments to develop and adopt their own electrification reach codes – as 30 jurisdictions throughout the state already have. The Bay Area is home to over 100 cities, most of them small and many of them under-resourced. Local governments do not have the staff resources or expertise to research and develop their own local reach codes, so they look to the state for leadership. A 2022 State Energy Code that includes an all-electric baseline would relieve local governments of this burden, allowing them to focus their resources on other critical issues.

The Air District has a history of working with state agencies to support aggressive targets and policies to reduce greenhouse gas emissions. The Air District has also long collaborated with state agencies to understand health risk disparities, reduce indoor pollution and improve public health within vulnerable and disadvantaged communities. To meet regional and statewide climate, air quality and environmental justice goals, a universal transition to fully decarbonized buildings will need to occur. Eliminating the use of natural gas in new construction is a necessary first step toward that end.

The Air District enthusiastically supports an all-electric building requirement in the 2022 Energy Code and looks forward to collaborating in our shared pursuit of a healthy, equitable, and carbon-free California.

Sincerely,



Jack P. Broadbent
Executive Officer/APCO

CC: Board Members, BAAQMD
Richard Corey, California Air Resources Board
Drew Bohan, California Energy Commission