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**BEEP Comments on Equitable Building Decarbonization Program
Draft Guidelines**

Additional submitted attachment is included below.



BEEP Coalition
Building Energy, Equity & Power

June 30th, 2023
California Energy Commission (CEC)
715 P Street
Sacramento, Ca 95914

RE: Equitable Building Decarbonization Program, Docket # 22-DECAR-03

I. Introduction

The Building Energy, Equity, and Power (BEEP) coalition¹ is comprised of environmental justice organizations across California who represent and advocate on behalf of low-income and communities of color, and lead local equitable building decarbonization efforts in Los Angeles, San Joaquin Valley, and the Bay Area. BEEP formed in 2020 with the intent to coalesce and uplift lessons and successes learned from these local efforts onto a statewide platform to ensure low-income communities and communities of color benefit, and are not adversely impacted by, statewide building decarbonization efforts in California.

To ground us in this work, we developed [Energy Justice Principles](#) that guide how we advance our mission and move towards a just energy future. As a core principle, we work to ensure our communities across the state have a meaningful voice in decisions that will impact them, such as this opportunity to comment on the California Energy Commission's (CEC) Equitable Building Decarbonization (EBD) Program guidelines.

In 2022, BEEP conducted five regional listening sessions statewide to inform community members about building decarbonization and the state's recent initiatives, as well as gather direct input on community needs and priorities related to building decarbonization. The findings from the listening sessions are shared in this [Preliminary Report](#), which is used to frame BEEP's comments on the EBD Program guidelines alongside lessons learned from recent local efforts.

We are optimistic of the EBD Program as it creates an opportunity to prioritize low income, energy-burdened households that are most impacted by the climate crisis as well as those historically disinvested, while also supporting the state's goal to reduce greenhouse gas emissions in our buildings. BEEP recognizes that the current program funds only cover a fraction of the amount required to equitably decarbonize homes in California. Understanding that the program will not be able to fully

¹ The BEEP coalition includes Center on Race, Poverty, and the Environment; Central Valley Air Quality Coalition; Leadership Counsel for Justice & Accountability; Local Clean Energy Alliance; Physicians for Social Responsibility-Los Angeles; PODER; and Self-Help Enterprises. Supporting consultants include Common Spark Consulting, and facilitation is conducted by Katie Valenzuela via the Central Valley Air Quality Coalition.

decarbonize every home across the state, the most climate- and housing-impacted communities must be prioritized in all aspects of the program.

We are hopeful that the EBD Program will set a precedent and provide important lessons to apply to future holistic building decarbonization programs across and in collaboration with various state agencies for greater impact in energy equity outcomes, such as whole-home improvements and greater access to clean energy technologies without resulting in negative unintended consequences. To be successful, the CEC must coordinate with the California Air Resources Board, the California Public Utilities Commission, and California Department of Housing and Community Development to develop streamlined pathways for low-income and communities of color to access services that improve their health, upgrade their housing condition and appliances, ensure resilience to climate change, and minimize bills.

BEEP’s policy recommendations complement the Healthy Homes Working Group (HHWG) EBD letter and both groups are aligned on various recommendations. Below are BEEP’s specific recommendations for the CEC Equitable Building Decarbonization Program, grounded in and uplifted from its Preliminary Report.

II. BEEP Preliminary Report Recommendations for the CEC Draft Program Guidelines

Preliminary Report Findings: Community Concerns	BEEP Recommendations to the CEC
<p><u>Equitable Process + Meaningful Engagement</u> Low-income communities and communities of color are often excluded from policy and programmatic policies on decarbonization, lack information on major projects and developments, and have difficulty trusting programs that do not have community input from inception to evaluation.</p>	<p><u>Chapter 2, Section B: Selection of Administrators</u></p> <ul style="list-style-type: none"> ● Include and specify dedicated funding to community-based organizations (CBOs) to guide local and culturally appropriate outreach, education, and support for participating households and communities. In addition, funding should be set aside for CBOs who would like to lead or be engaged with supporting communities during and after installation to ensure quality outreach and installation was conducted from start to finish. ● Ensure that CBOs are key decision makers in the development of the administrator selection criteria. It is critical that CBOs have a role in influencing the selection of administrators to ensure that administrators and those they contract with demonstrate quality installation work and service, ability to work alongside CBOs, and commitment to the program's equity goals. <p><u>Chapter 4, Section B: Metrics and Data Collection</u></p> <ul style="list-style-type: none"> ● Include “CBO partner satisfaction working with the program administrators” as a metric to “Advance energy equity.” There needs to be accountability for selected administrators to work in partnership with CBOs, and a pathway for CBOs to evaluate this

	<p>partnership and share results with the CEC and the Legislature to ensure program administrators are aligned with the energy equity intentions and goals of this program.</p>
<p><u>Distributional Justice: Costs + Affordability</u> Cost presents a significant barrier to adoption. Many households cannot afford the transition, or are ineligible for incentives or funding currently available.</p>	<p><u>Chapter 1, Section D: Budget</u></p> <ul style="list-style-type: none"> ● The EBD Incentive Program should not replicate IOU rebate programs, but rather should pay the full-cost of clean energy and energy efficiency upgrades and appliances for low-income households. Rebate programs have been inaccessible to low-income and communities of color due largely to the inability to pay upfront costs. Providing the upfront cost of upgrades and appliances will help remove this financial barrier. <p>Costs are not the only barriers for low-income and communities of color to participate in building decarbonization programs. The following barriers must be addressed as well:</p> <p><u>Chapter 2, Section E: Household/Property Eligibility</u></p> <ul style="list-style-type: none"> ● Do not ask for income verification for all working household members in a single family home – require only the homeowner or head leaseholder to provide proof of income for eligibility. Many low-income, BIPOC, and immigrant households are multigenerational and/or have more than one family residing in a home. Asking for the income of all working household members may provide an inaccurate perception of a household’s financial situation and thus its eligibility for the program. ● Include households who burn wood as a primary source of heat in the eligibility criteria. Many households, particularly in the San Joaquin Valley, have been redlined from gas connections and instead burn wood for heat. These households experience significant energy inequities and should not be excluded from the program. ● In line with the Healthy Homes Working Group’s recommendation, BEEP also recommends creating alternative eligibility verification pathways for immigrant communities and others that may lack documentation. Immigrant communities make up a significant portion of low-income and energy-burdened households – it is imperative that eligible households are not systemically barred from participating in the program.
<p><u>Renters’ Rights + Protections</u></p>	<p><u>Chapter 4, Section C: Tenant Protections</u></p>

The majority of low-income Californians are renters, spending more than one-third of their income on rent and utility bills every month, and thus vulnerable to evictions and displacement. There is concern that renters will not access the programs, or will become more vulnerable when landlords pass down costs of decarbonization to renters by increasing rent and property value.

BEEP supports the following tenant protections recommendations from Strategic Actions for a Just Economy.

The effectiveness of the EBD program, designed to assist low-income households, will be undermined if these households experience an increase in housing costs or, even worse, face eviction as a result. Therefore, it is of utmost importance to incorporate robust tenant protections into such programs. These protections should include strong rent caps, eviction safeguards, and other measures to prolong the availability of affordable housing units.

It is important to recognize that not all tenants enjoy the same level of protection or face identical circumstances. Here are the different categories of tenant protections:

- **Local rent control:** Some tenants benefit from local rent stabilization ordinances that establish rent caps and impose restrictions on evictions.
- **State rent control:** Other tenants are protected solely by the State's rent control legislation (AB1482), which is comparatively less stringent than local rent control. It contains a provision that allows eviction for substantial remodeling purposes.
- **Affordable Housing:** Certain individuals reside in nonprofit Affordable Housing units, which may have deed restrictions that could potentially expire within the next 20 years.
- **No Protections:** Lastly, there is a segment of renters who do not have any specific protections at all, typically those residing in buildings that are less than 15 years old.

By acknowledging these variations in tenant protections and addressing the specific needs of each group, we can work towards ensuring housing stability and security for all residents across California. The specific recommendations include:

1. Maintain Affordability through Rent Caps and Extended Deed Restrictions

For Affordable Housing Units: In the case of Affordable Housing rental units participating in the program, it is crucial for the CEC to **mandate an extension of any existing deed restrictions by 10 years**. For instance, if a building's deed restriction is set to expire in 2029, after program participation, it should be extended to expire in 2039.

For private rental housing: A significant portion of the state's affordable housing stock lacks deed restrictions, and property owners of such units have the option to raise rents to cover the costs of decarbonization measures, even if they are protected by local rent stabilization laws. **If a private rental unit participates in the program, they should be subject to a rent cap of 3% for 5-15 years.** Furthermore, property owners should be prohibited from utilizing existing cost recovery programs to increase rents. **Any rent increases up to 3% should only be based on documented actual increases in property taxes, amortizing improvements to the property unrelated to decarbonization, and legitimate increases in expenses for property maintenance and operation.**

The Rent Cap Proposal:

- Annual rent increase capped at a maximum of 3% for 15 years.
- This implies that private landlords cannot employ cost recovery programs like LA's Major Capital Improvements Program to justify rent hikes.
- Tenants protected under AB1482 would benefit from stricter rent control provisions, reducing the annual allowable increase from 10% to 3%.
- **Tenants who previously had no protections would now have safeguards in place.**
- It is advisable to include a provision that if a tenant vacates during the designated period, the unit maintains the same rental rate as the vacating tenants for the duration of the rent cap.

2. Restrict evictions

In order to ensure that program participants truly benefit, it is crucial to implement robust eviction protections. We must prevent landlords from exploiting lax eviction laws and the AB1482 loophole, which allows them to easily evict tenants under the pretext of remodel work.

To address this concern, if a landlord participates in the program, they must be prohibited from evicting tenants for 15 years for any reason other than nonpayment (where the owed amount must exceed one month of Fair Market Rent (FMR) for the respective unit size) or engaging in criminal activities.

3. Target funding to small non-corporate landlords

Administrators should create criteria that outlines landlord prioritization in the programs: **Property owners that are private equity firms should be ineligible for funding.** Prioritization must be given to small landlords who experience some form of financial hardship. In Los Angeles, over 67% of rentals are owned by corporate landlords that have access to capital and can afford to decarbonize. With limited public funding, the funding should be targeted to property owners who will struggle to afford to retrofit.

4. Tenant Relocation and Safeguards

The potential need for tenant relocation due to the construction work associated with this program raises concerns that must be addressed. One critical solution is to **allocate adequate funding specifically designated for tenant relocation.** This provision is vital to ensure that tenants do not face undue inconvenience or safety risks during the relocation process. By securing sufficient financial resources, we can minimize disruptions and prioritize the safety and comfort of tenants.

In conjunction with relocation assistance, it is crucial to **establish a robust right-to-return policy.** This policy guarantees that tenants who are displaced due to the construction work will have the opportunity to return to their original units once the work is completed. Implementing such a policy provides tenants with the reassurance of long-term stability and protects their housing rights.

To further alleviate the impact of relocation, it is recommended to **limit the duration of the construction work to a maximum of 30 days.** Additionally, efforts should be made to ensure that the construction activities are carried out consecutively, minimizing any unnecessary delays or interruptions that could prolong the inconvenience for tenants.

These safeguards will be highly critical to protecting renters in the case of whole home retrofits.

5. Minimize disruptive construction

- The direct installers should receive tenant sensitivity trainings to minimize harm and disruption to tenants.

- Regulation of construction: Design the program to ensure upgrades can be made without disrupting tenants' living conditions.
- Length of work: Landlords may not carry out work for more than 30 days and may not terminate tenancies for retrofit work.
- Health and Safety: Assess scope of work and determine if it's safe for tenants to remain in place, if not, require relocation.
- Relocation: If a tenant must be relocated due to retrofit projects, the property owner must re-house the tenant within a 2 mile radius of the existing home and of equally suitable accommodations. Landlords must also provide a per diem relocation allowance similar to the GSA rates in addition to rehousing.
- Time: Allowable times for construction work to take place should happen within reasonable time frames (9am-4pm M-F) and be done on consecutive days.
- Notice: Require prior notice to residents about the upcoming upgrades, including information about the scope of work, expected timeline, and any disruptions that may occur during the construction or installation process.
- Quality Assurance: Provide a list of qualified contractors who are certified to do high quality work; or offer direct install when possible.

6. Develop enforcement mechanisms

- Have the landlord, CBO case manager, and tenant sign an agreement outlining all the requirements and restrictions. Agreements must be translated into relevant languages; Administrators shall create a template agreement in relevant languages. All parties receive a copy of the agreement. Include CBO contract information so tenants can get in contact in the event of Owner violations.
- CBO contractor provides tenants with notice of their legal rights and the specific provisions of the agreement with detailed explanation of rights, liabilities, and avenues of legal recourse.
- CBO should work to ensure the contract is being followed by conducting 6 month follow ups, talking to both property owner and tenant, and requiring property owners to certify they have followed the agreement.

	<ul style="list-style-type: none"> ● CBO contractor should have the authority to investigate complaints made by the tenant and conclude if the property owner violated the Agreement. ● Require each 6 months or year that landlords certify that the same tenant and rent rate exists and make them attach annual registration information with their respective cities, if that is required. <p>7. Penalties for violating restrictions</p> <ul style="list-style-type: none"> ● In the event of a breach of the agreement, the owner should reimburse the CEC in the amount equal to all costs of all energy efficiency and electrification measures installed and labor performed on the premises, including overhead costs, as well as attorney’s fees, court costs and interest at the statutory rate for judgments from the time of the breach. ● Owner should also be liable for damages to a tenant or applicant for tenancy in the amount of \$100 per day. ● If landlord cannot repay costs, a lien should be placed against their property. ● Owner is banned from future public funding for any buildings they own. <p>8. Need for agency coordination</p> <p>BEEP understands that the CEC does not have regulatory authority over housing, but we highly recommend that the CEC coordinate with government agencies who do have regulatory oversight to ensure tenant protections are not violated.</p>
<p><u>Regulated Affordable Housing</u> There is a lack of funding and staff capacity to plan, design, and pay for all-electric new construction or make decarbonizing retrofits in existing deed-restricted affordable housing buildings. Mission-based affordable housing providers also often face difficulty in navigating funding streams for all-electric developments and retrofits.</p>	<p><u>Chapter 2, Section G: Outreach and Engagement</u></p> <ul style="list-style-type: none"> ● In addition to partnering with CBOs to develop outreach materials and conduct culturally appropriate outreach to targeted households, the program administrators should work with CBOs to target owners/agencies of regulated affordable housing, nonprofit affordable housing -- small “mom-and-pop” affordable housing and mission-based affordable housing to ensure underresourced multifamily building owners can access the program in service of their tenants. Program administrators should provide training, education, and technical assistance and resources (e.g. how to access the EBD funds and implement decarbonization measures without unnecessarily displacing tenants for a long period of time as retrofits occur) to eligible and

	underresourced affordable housing providers.
<p><u>Workforce Development + High-Road Jobs</u></p> <p>Job quality of electrification and decarbonization work to-date is more reflective of a low-road vs high-road approach due to lack of focus on workforce development and high-quality job creation. Reductions in natural gas use and development will impact many union jobs.</p>	<p><u>Chapter 4, Section D: Workforce Standards and Requirements</u></p> <ul style="list-style-type: none"> ● Ensure strong labor standards on work performed with public dollars. Any publicly subsidized or funded retrofit program should be bound by a Project Labor Agreement (PLA). Administrators shall adopt a Multi-Craft Community Workforce Agreement or Project Labor Agreement negotiated with the Building Trades to cover work funded by this program. ● Include enforcement mechanisms for applying prevailing wage requirements at every contracting tier. Contractors shall pay all workers performing construction work a total wage and benefits package that is at least equivalent to the general prevailing wage rate as determined by the Department of Industrial Relations pursuant to Sections 1773 and 1773.9 of the California Labor Code. Contractors shall employ apprentices enrolled in a state-approved apprenticeship program in the same manner and same minimum ratio as set forth in Labor Code section 1777.5 for public works projects. ● Contractors and subcontractors with a history of labor violations or building code violations should be ineligible for program work or funding. ● Eligible contractors shall provide healthcare for workers and dependents that meet Covered California’s Silver Level, and provide portable retirement benefits. Administrators must provide language accessible technical assistance for contractors who do not yet meet this criterion but are interested in doing so. ● In the Workplan, ensure preference for workforce that is local and historically underrepresented in economic opportunities. Local can be defined to mean contractors residing in the same city or county, or at least in the adjacent county to the target communities. Local contractors should also be able to speak the language of the participating households. In addition, the contracted workforce should prioritize including women, BIPOC, and re-entry individuals. ● The EBD program should consider the high-road workforce development approach to building out effective outreach networks that prioritizes hiring outreach specialists from the community in which outreach is performed and offering livable wages plus benefits. ● Include dedicated funding for training programs (e.g. state registered apprenticeships and MC3

	<p>apprenticeship readiness programs) that target individuals underrepresented in economic opportunities, e.g. women, BIPOC, and re-entry individuals, and dedicated funding to develop and/or augment existing apprenticeship readiness and apprenticeship programs to provide training in heat pumps systems, home energy efficiency upgrades, solar installations, and etc.</p> <ul style="list-style-type: none"> ● Involve CBOs in the development and outreach of the Quality Assurance Plan. The Quality Assurance Plan should include measures to prevent poor quality of service. The EBD program should learn from and not repeat the lack of administrator and contractor accountability in the San Joaquin Valley pilot program, which has led to poor quality service and lack of post-installation support for households who ended up with broken appliances or with greater energy bills due to not being given any instructions on how to use their new appliances efficiently. Residents should be given a direct communication channel to the program administrator or the CEC if contractors are not providing quality service or if issues arise. Program administrators must commit to timely responses to address any deficiencies that arise, at no cost to the household. If contractors are found to be neglectful or conduct poor quality service, they should be disqualified for any future projects under the program. ● Create sister policies and programs facilitating workforce transitions. Decarbonization policy may decrease demand for good-paying, hard-to-replace union jobs associated with gas infrastructure such as plumbing and pipefitting. The state should consider the negative impacts to workers whose jobs will be lost through fuel switching, and develop policies that create demand for these workers’ existing skills while increasing the climate performance of buildings.
<p><u>Holistic Upgrades: Health, Safety, + Resiliency</u> Many homes and apartments simultaneously need energy efficiency upgrades and other upgrades to accommodate building decarbonization technologies and to ensure cost savings after a project is completed.</p>	<p><u>Chapter 2, Section I: Eligible Measures & Section J: Pricing and Cost Caps</u></p> <ul style="list-style-type: none"> ● Support retrofitting homes through a holistic approach that improves public health and improves home infrastructure. Home upgrades should include, but not be limited to, lead and asbestos removal, electrical panel upgrades, energy efficiency upgrades, and any remediation to remove barriers from installing heat pump water heaters, induction stoves, and other electrical appliances. ● Having tenant relocation funds and safeguards in

	<p>place (as described above in the Tenant Protections section) will help support tenants if needed to relocate for whole home retrofits. These protections include: adequate funding specifically designated for tenant relocation; a robust right-to-return policy; and a limited duration of the construction work to a maximum of 30 days.</p> <p><u>Chapter 2, Section J: Pricing and Cost Caps</u></p> <ul style="list-style-type: none"> ● In line with the Healthy Homes Working Group’s recommendation against setting any cost cap, BEEP also recommends removing the \$5000 average cost cap per low-income household. From the San Joaquin Valley projects to local building decarbonization projects, the costs to remediate homes for decarbonization have been found to vary drastically, and on average \$5000 will not be sufficient to take a whole-house retrofit approach to ensuring a household can benefit from decarbonization, particularly for manufactured homes. Setting a cost cap may exclude households that may need deeper remediation and safety work as well as limit the extent to which the program can provide a holistic, whole-home approach to decarbonization. With a holistic, whole-home approach, low income and BIPOC households will experience the full benefits of decarbonization: lowered energy costs, climate and energy resilience, improved indoor air quality and health, and indoor safety and comfort.
<p><u>Supply Chain: Gas Infrastructure + Lithium Extraction</u></p> <p>Both retiring the gas infrastructure and extracting lithium may present serious impacts on public health and the environment if not properly studied, managed, and communicated to nearby communities who are mostly low-income communities and communities of color.</p>	<p><u>Chapter 2, Section 1: Eligible Measures</u></p> <ul style="list-style-type: none"> ● Ensure replaced equipment that is removed from the site is property recycled or disposed of in accordance with federal, state, and local regulations, in addition to ensuring the recycling and disposal activities do not present any environmental or health impacts on nearby communities, if any. ● As the state transitions towards electrification, it is essential that the development of these new technologies do not cause more harm to already disadvantaged communities including but not limited to lithium extraction.

III. Additional Recommendations

For recommendations that do not fit neatly under any of the “Community Concerns” from the Preliminary Report, we have listed them below.

- Chapter 1, Section B: Program Goals
 - **Define energy equity.** If the CEC intends to “advance energy equity” as a goal, it must clearly define energy equity and set appropriate metrics. A suggested definition that incorporates BEEP’s Energy Justice Principles can be “Energy equity means ensuring that energy programs, resources, decision-making, and services target and prioritize communities who have been most harmed by the fossil fuel industry and neglected from clean renewable energy investments. Pursuing energy equity leads to improved public health, greater climate resilience, local high road job creation, energy democracy, and cost savings.”
- Chapter 2, Section D: Initial Community Focus Areas
 - **Include prioritization of low-income homes located next to polluting sites** and activities (e.g. oil refineries and freeways), **communities suffering from health impacts of indoor and outdoor air pollution** (e.g. high rates of asthma and respiratory illness), and **communities vulnerable to the impacts of extreme heat** in the criteria for identifying initial community focus areas. In addition, BEEP is aligned with and supports the Healthy Homes Working Group’s recommendations on criteria identifying community focus areas.
- Chapter 4, Section A: Program Coordination and Incentive Layering
 - **Commit to long-term interagency coordination** for streamlining and “stacking” EBD-related programs that target indoor and outdoor air quality, including ensuring income eligibility is the same across all income-eligible programs. Households who qualify for the EBD program should also automatically eligible for other energy equity programs such as the Solar on Multifamily Affordable Housing program, Self-Generation Incentive Program, and Low Income Weatherization Program, etc.
- Chapter 2, Section A: Regional Allocation of Funding
 - **Increase the number of regions and funding for CBO partners.** There are significant demographic, climate, and building stock differences across these vast regions. In order for the program to be equitable, the program administrators must provide tailored service to each household, responding to their unique needs. It will be easier to provide this service in partnership with local CBOs, but a few local CBOs cannot cover the expansive regions the CEC has set for this program. Increasing the number of regions should also increase the number of CBOs program administrators need to partner with to adequately respond to each community’s unique needs. In addition, BEEP is aligned with and supports the Healthy Homes Working Group’s suggestion to increase the number of proposed regions based on suggested examples from other statewide programs.
- Chapter 4, Section B: Metrics and Data Collection
 - **Include these metrics of energy equity:**
 - Overall improvement of participant/household health (e.g., improved mental health, reduced rates of asthma and respiratory illnesses, reduced frequency of headaches, nausea, and etc.)
 - Overall participant satisfaction before, during, and after installation
 - Diverse set of homes in varying conditions in different climate zones are targeted so that lessons can be drawn and applied to future programs
 - Local hired workforce includes those who were systemically barred from economic opportunities, e.g. BIPOC, re-entry individuals, and women.
- Chapter 2, Section H: Set-Aside for Manufactured Homes
 - **The CEC and program administrators must be familiar with the unique challenges of**

holistic decarbonization for manufactured homes. The U.S. Department of Housing and Urban Development developed the Manufactured Home Construction and Safety Standards in 1976, which have not been updated since. Consequently, the majority of manufactured homes throughout the state are severely dilapidated and energy inefficient and require up to \$30,000 for holistic decarbonization. Additionally, regulation of manufactured homes and ownership structures create challenges in project implementation. Different aspects of manufactured homes and mobile home parks are regulated individually at the federal, state, and local level making implementation processes more challenging. There is also a challenge in that manufactured homes are typically privately owned and placed on privately owned land parcels instead of a manufactured home community.²

- The CEC must require program administrators to have expertise and resources for manufactured homes.
- **Again, we do not recommend cost caps but in the case that these are implemented the CEC should have a higher average per-home/unit cost cap for manufactured homes.**
- The CEC should clearly identify all possible ownership structures eligible for the program.
- **A 5% set aside for manufactured homes is low given the high need and expense of holistic improvements. The CEC must determine the percentage set aside for each region according to the number of eligible manufactured homes in each region.**

IV. Conclusion

The recommendations outlined above will ensure that the Equitable Building Decarbonization Program is responsive to and aligned with the needs and priorities of the communities the program intends to target. We believe the most important measure of success for this program is to achieve equitable outcomes for BIPOC and low-income communities across the state. By adopting and implementing these recommendations, not only frontline communities but all Californians will benefit from building decarbonization through this and future efforts.

We thank the CEC for the opportunity to respond to the program draft guidelines, as well as its intention to center equity in this effort. We look forward to working more closely with the CEC for any future opportunities as it finalizes the guidelines and begins to implement the program.

Sincerely,

The BEEP Coalition

- Katie Valenzuela, Senior Policy Advocate, Central Valley Air Quality Coalition (CVAQ)
- Antonio Díaz, Executive Director, PODER
- Edgar Barraza, Energy Equity Policy Coordinator, Physicians for Social Responsibility - Los Angeles
- Mariela Loera, Climate Policy Coordinator, Leadership Counsel for Justice and Accountability
- Grecia Orozco, Staff Attorney, Center for Race, Poverty, & the Environment
- Jessica Tovar, Energy Democracy Organizer, Local Clean Energy Alliance

² [SJV DAC Pilot Projects Process Evaluation](#)

These policy recommendations are also endorsed by local partners of BEEP members:

Robert M. Gould, MD, President
San Francisco Bay Physicians for Social
Responsibility



Zach Lou, Coalition Manager
Green New Deal Coalition



Nancy Halpern Ibrahim, Executive Director
Esperanza Community Housing



Augustin Cabrera, Policy Director
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