January 21, 2026

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

Re: Zero-Emission Space and Water Appliance Standards Workshop

Dear Staff of the California Air Resources Board:

The Building Energy, Equity and Power (BEEP) Coalition provides the following comments on the California Air Resources Board's (CARB) zero-emission space and water heater standards December 11, 2025 workshop.

The BEEP Coalition includes representatives from the Alliance of Californians for Community Empowerment; PODER; the Center on Race, Poverty & the Environment; the Central Valley Air Quality Coalition; Leadership Counsel for Justice & Accountability; Local Clean Energy Alliance; Physicians for Social Responsibility-Los Angeles; Central California Asthma Collaborative; Emerald Cities Collaborative - Northern California; and Communities for a Better Environment. The BEEP Coalition represents environmental and housing 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.

While we are pleased to see CARB move forward developing strategies on zero-emission space and water heater standards, we are surprised and caught-off-guard about CARB's proposed sales target approach to equitably and effectively regulate appliances towards a goal of zero-emissions. We expected, with our prior engagement with CARB - and our extensive work installing zero-emission appliances in the field - that we would have been more involved in discussions around this new approach.

While we see the effort by CARB to develop a flexible pathway to account for equity and end user concerns, the proposed sales target approach will <u>fail</u> to address the equity barriers that prevent low-income households and households in already underserved areas access zero emission appliances. These very communities are more concentrated in our most polluted air basins - which draws into question whether this approach aligns with the broader targets of the State Implementation Plan that initiated this process.

The current structure provides flexibility to manufacturers on meeting carbon reductions *and* on achieving equity. The structure also pits equity (donations) against needed carbon reductions. Instead, funding mechanisms are needed to support low income households and vulnerable communities to comply with an appliance standard. Unfortunately, the proposed credit trading system will only manage carbon, not remove it, while still leaving households without the necessary support to enjoy the full benefits of adoption and compliance.

It would be helpful to learn more about the journey CARB took to arrive at this approach, and to see the data that demonstrates this approach was deemed more effective than a point of sales regulation with a complementary effort to ensure funding for low-income households. Not only do we have concerns on how equity is considered in the proposed approach, but we are also concerned about the effectiveness of sales target approaches (used, for example, for solar and electric vehicles) to meet the aggressive climate goals. The proposed regulatory scenarios falls short of reducing greenhouse gases (GHG) in line with the 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan) and reducing smog-forming nitrogen oxide (NOx) emissions in line with the 2022 State Strategy for the State Implementation Plan (SIP).Furthermore, the sales target approach still leaves us with ample emissive sales at the end of the regulatory timeline.

Our primary recommendation at this point would be to request that CARB take additional time in this process to engage with stakeholders on exploring changes to the current proposal or other approaches that stakeholders can agree align with the climate and equity needs for an effective policy. BEEP has found our engagement with CARB staff to be generative and productive, and we are confident that CARB could provide an even stronger starting point for its regulatory deliberations after some additional stakeholder engagement. One way to strengthen the equity aspect would be to remove flexibility on the equity component (e.g., mandate certain sales through certain programs), while retaining flexibility on how hard emission reductions are met.

BEEP also encourages an interagency conversation around the proposal to ensure other agencies' efforts are complementary and not in conflict with what CARB is proposing, and that we are proactively working together to avoid unintended consequences (such as renovictions and access to programs due to readiness via health and safety measures). While we have often acknowledged that CARB does not have all of the tools necessary to achieve equitable building decarbonization, you do hold some of those tools. The BEEP Coalition has proposed an Interagency Taskforce process that would bring the right stakeholders (See Appendix) together to develop a work plan that would achieve our building decarbonization goals in California–leveraging all the powers across different agencies. We are very concerned that action on a sales target approach will redirect essential CARB resources away from that broader mission. We need assurance from CARB leadership and staff that you all will remain highly engaged in that process, and are willing to enact further rules and regulations that align with the outcome of that interagency process. Without CARB's participation, this collaborative effort, along with our collective equity and climate goals, is doomed to fail.

Thank you for your time and consideration of our comments.

Sincerely:

The Building Energy Equity & Power Coalition

Appendix - BEEP Proposed Interagency Taskforce

BUILDING ENERGY EQUITY & POWER

Interagency Coordination Proposal from the BEEP Coalition

Prepared October 2025

The Building Energy, Equity & Power (BEEP) Coalition respectfully submits this proposal for an interagency taskforce focused on equitable building decarbonization. This proposal builds off of prior collaborative efforts across state agencies that successfully revamped road standards (SB 743, 2013), the AB 32 Scoping Plans, and other such efforts.

Working together, California can be a leader in equitably decarbonizing buildings.

Agencies to engage:

- California Air Resources Board
- California Department of Community Services and Development
- California Department of Public Health
- California Energy Commission
- California Housing and Homelessness Agency
- California Public Utilities Commission
- California State Treasurer's Office
- Governor's Office
- Local air districts
- Public Housing Agencies

Stakeholders to engage:

- Academic research institutions working on building decarbonization (UCB)
- Affordable housing providers
- California Association of Code Enforcement Officers
- CARB AB 32 Environmental Justice Advisory Committee
- CEC Disadvantaged Communities Advisory Group
- CPUC Disadvantaged Communities Advisory Group
- Implementors for the CEC Equitable Building Decarbonization Program
- Members of the BEEP Coalition
- Members of the Healthy Homes Working Group
- State Building and Construction Trades

Goals:

- Streamline and align state funding and incentives to facilitate whole home retrofits and zonal decarbonization efforts.
- Establish a unified application process for residents and building owners.
- Create a clear process for resident questions or concerns pre- and post-installation.
- Establish clear training and labor requirements for contractors who are eligible for funding/projects.
- Create an “equitable building decarbonization roadmap” that outlines key steps and benchmarks to achieve full building decarbonization by 2045.
- Provide recommendations for implementation of the new “price ceiling” revenue from Cap-and-Trade directed toward energy projects.
- Provide recommendations for policy gaps that need to be addressed around tenant protections and other issues for Legislative consideration.

Proposed Process:

- Work with community based organizations and researchers to design and implement a community engagement process and any other research needs to inform the work of the taskforce.
- Inventory prior reports and current programs, build common understanding of issues and lessons learned to date. Include agency- and community-led efforts.
- Create a common definition for “equitable building decarbonization” for California.
- Outline current resources and regulations; identify gaps and repetition using the definition of equitable building decarbonization and lessons learned from prior efforts.
    - Identify areas that agencies can tackle without legislative intervention.
    - Identify areas that would require additional legislative intervention.
- Create a timeline for agency-led efforts.
- Conduct periodic public meetings and allow public comment related to taskforce discussions.
- Generate a public report/plan, including a timeline and next steps to ensure full building decarbonization by 2045.
    - Provide a draft plan for at least one round of public workshops, review and comment.
    - Include recommendations for Legislative consideration.
    - The final plan should be formally adopted by each agency participating in the taskforce.
- Establish regular (at least biannual) meetings that are open to the public to report on progress, discuss obstacles and next steps, and hear public comments.

info@beepcoalition.org | https://beepcoalition.org/