

Jennifer Elwell

From: Josie Gaillard [REDACTED]
Sent: Monday, October 18, 2021 9:08 AM
To: Jennifer Elwell; BAAQMD Comments
Subject: Request to phase out gas earlier

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October 18, 2021

Submitted via email to jelwell@baaqmd.gov and Comments@baaqmd.gov

Dear BAAQMD Board Members:

I write to urge you to consider pulling in to 2024 the phase out date for sales of gas furnaces and water heaters in the Bay Area. The health benefits are clear and the climate consequences of delay are even clearer. Please also note that seven weeks from tomorrow, on December 7, 2021, large subsidies will become available statewide through the State's TECH program. These subsidies are designed to reduce the cost of replacing gas furnaces and water heaters with climate-friendly alternatives, closing cost gaps that exist today. The significant impact of these subsidies is a rather recent development that did not seem to be fully considered in staff's report.

Hundreds of millions of vulnerable people around the world stand to be impacted by your decision today. In its recent 6th assessment, the Intergovernmental Panel on Climate Change (IPCC) noted that quickly reducing emissions from methane gas is one of our most powerful near-term levers to avoid the worse effects of climate change. The power to use that lever, by shifting us off of our dependency on methane gas, is in your hands and the impact of your decision today on global climate change cannot be understated. As Washington, D.C. stumbles to address climate change and equity, the eyes of the nation are on BAAQMD as it considers a policy that will likely be replicated by other air districts in California and beyond, becoming one of the most consequential climate policies of the year in the United States.

Equity Concerns. In considering the equity impacts of your policy decision today, I respectfully request that you broaden your lens to consider the equity of the 600 million people around the world who live in vulnerable coastal communities and whose contribution to climate change has been minuscule compared to ours here in the United States. To them, our delay certainly does not look like equity.

A Different Approach to Equity. Rather than delay the effective dates of the zero-NOx amendments to Regulation 9, Rules 4 and 6, to 2027-2031, I urge you to pull those dates in to 2024 and work with California legislative partners to identify full funding for electrification of low-income households. **Specifically, I suggest that a trigger be added to the proposed BAAQMD amendments, whereby the regulations could go into effect as early as 2024, if the California state legislature is able to secure funding to completely alleviate any financial burden associated with electrification for low-income households.** The terms of such a trigger should be crafted with input from representatives of low-income communities so that the legislature knows how to address equity concerns identified by the impacted community. In speaking with a member of the California State Senate about this solution, he thought such an approach could actually help focus the legislature's attention on the need to close this funding gap for low-income Californians and give them a clear idea of how to do it. I would be happy to discuss further this relatively low-risk amendment to the proposed regulation.

In closing, the answer to equity is not delay, because every moment lost fighting climate change will cost the world in lives. Instead we can increase total equity, both globally and locally, by accelerating action on climate change, taking harmful appliances off the shelves, and finding ways for those of us who can afford these changes to help those who would be burdened by them. We can do it. We need BAAQMD's leadership today.

Sincerely,
Josie Gaillard
Menlo Park Environmental Quality Commissioner