Communication from Public

Name:	Matthew Millikin
Date Submitted:	11/09/2022 10:35 AM
Council File No:	22-0151
Comments for Public Posting:	Hi. I definitely think we should push for building electrification. Decreasing our reliance on fossil fuels is imperative and it's at the local level we will accomplish this. It's important to meet our climate goals, but it's also important for the health of our citizens. The recent study by PSE Healthy Energy (with results featured in the NY Times) went into detail about the toxins/carcinogens found in our local gas supplies; it's not good for us. Retrofitting our buildings to remove these appliances is challenging and expensive, while building without having to run gas lines is easier, less expensive, and will be better for the inhabitant's health. I can't afford it now, but I'm looking forward to removing my gas heater and replacing it with a heat pump and removing my gas stove and getting a better induction range. Both will run more efficiently, healthier, and be cheaper in the long run. I wish my place had been set up like that originally.

Communication from Public

Name:

Date Submitted: 11/09/2022 10:37 AM

Council File No: 22-0151

Comments for Public Posting: Bloom Energy is pleased to provide comment on this important council file. Bloom Energy is a clean energy company, our non-combustion fuel cells are a distributed energy resource that delivers reliable, uninterrupted power primarily to commercial and industrial customers and critical facilities, like hospitals, grocery stores, and data centers. Because our technology is non-combusting it produces virtually no local air pollutants like NOx and SOx, and drastically reduces particulate matter compared to combustion sources, particularly back up diesel generators, which have increased in the SCAQMD basin by 22% since 2018 amounting to approximately 7GW of capacity – that's roughly the equivalent capacity of three Diablo Canyon nuclear power plants. Bloom Energy supports building electrification, it's a critical component to address climate change. Well-crafted initiatives that focus on eliminating fossil fuels in buildings in favor of cleaner and feasible alternatives, such as heat pumps and induction stoves will help us achieve our climate goals and improve indoor air quality. We encourage council to support a definition of a fully electrified building as one that focuses on replacing the energy end uses within a building. A definition focuses on the building profile reduces the potential for unintended consequences that could inadvertently limit the ability to deploy DERs like fuel cell microgrids while providing exemptions for diesel generators. This will ensure multiple pathways to building electrification and enable clean energy DERs like SOFCs to reduce natural gas use in buildings.

Communication from Public

Name:	Ben Stapleton
Date Submitted:	11/09/2022 09:57 AM
Council File No:	22-0151
Comments for Public Posting:	Please see USGBC-LA's Letter of Support attached regarding Item #22-0151

USGBC LA
U.S. GREEN BUILDING COUNCIL LOS ANGELES

525 S. Hewitt St.
Los Angeles, CA 90013
(213) 689-9707 usgbc-la.org

November 9, 2022

City of Los Angeles
Office of the City Council

Via Email

Re: Support for Building Electrification – Item #22-0151

To Whom It May Concern:

On behalf of the U.S. Green Building Council - Los Angeles (USGBC-LA), we are writing to support the City of Los Angeles proposal to decarbonize new buildings while supporting all citizens and workers.

USGBC-LA's more than 3,000 members are sustainability and green building professionals with a deep commitment to addressing climate change and other local, state, and international environmental issues. Our members are designers, engineers, public agency and utility staff, consultants, product manufacturers, and service providers. Founded in 2002, our mission is to accelerate all aspects of sustainability in the built environment to create a more sustainable region for all.

USGBC-LA actively supports decarbonizing our economy to address climate change and help meet California's 2045 carbon neutrality goal. Decarbonizing buildings must be a cornerstone towards achieving this goal since the building sector accounts for over 25% of the state's GHG emissions. Building electrification means designing new and retrofitting existing buildings as all-electric powered by renewable energy. USGBC-LA members are available to support cities and communities considering the adoption of electrification ordinances or local amendments to the State energy code known as "reach codes." The Chapter has compiled a list of key references it will happily provide. The Chapter believes Cities should move aggressively to:

- Mandate all-electric for residential and commercial new construction. Exemptions should be extremely limited.

- Increase the percentage of required parking spaces with EV-ready infrastructure in new multi-family and office buildings.

- Require full electrification for major renovations and additions.

Local ordinances requiring all-electric new buildings make sense now for the following reasons:

- Becoming mainstream: Electrification is quickly moving mainstream. Title 24, the California Building Standards, will require that all buildings be wired for electric appliances starting January 1, 2023, including heating/cooling, water heating, cooking, and clothes dryers; depending on the building type, some systems must be

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Los Angeles, CA 90013
(213) 689-9707 usgbc-la.org

electric. In addition, over 50 California cities have adopted electrification ordinances or reach codes and many others are considering similar policies.

- Greenhouse gas emissions: Buildings create approximately 25 percent of California's greenhouse gas emissions,[1] including power generation, and are a major contributor to local air pollution. Allowing the construction of additional new buildings that burn natural gas locks in decades of additional fossil fuel emissions. A recent study Rocky Mountain Institute study indicates that a delay in adopting all-electric codes will add another 3 million tons of carbon emissions by 2030.[2]

- Occupant health, safety, equitability: Multiple studies[3] [4] have documented that all-electric homes are healthier for the occupants because they provide cleaner indoor air quality, which is of particular benefit for children, older adults, and other vulnerable populations. This particularly benefits people of modest means.

- Job creation: Another study[5] shows that building electrification can lead to a net increase of over 100,000 living wage jobs statewide.

- Affordability: All-electric new buildings are affordable to build and operate.[1] Studies have shown that the lifetime costs for all-electric homes are similar to or less expensive than mixed-fuel homes for a large majority of Californians. In addition, there are substantial utility rebates available now and more soon to be released for efficient electric end-uses.

- High-performing technologies: High performing and efficient electric technology is available for all residential and commercial uses, including water heating, space heating and cooling, and cooktops. Key electric technologies include, heat-pumps, induction cooktops, solar photovoltaics, and energy storage.

- Developer demand: Residential and commercial developers are realizing the benefits of all-electric buildings not only for the environment but also for their bottom line. Our members across different facets of the building profession all report high client demand for high-performing all-electric buildings.

- Electric grid resilience: Electric heat-pumps can help improve the reliability of the electricity grid by facilitating the increasing percentage of renewable energy.[6]

For all these reasons, we urge that the City of Los Angeles approve the decarb motion currently before it. We look forward to working with the City on building a clean energy future.

Sincerely,

Ben Stapleton
Executive Director, USGBC-LA

[1] California Air Resources Board, *Building Decarbonization Program*
[2] Rocky Mountain Institute, *The Economics of Electrifying Buildings*, 2018
[3] Rocky Mountain Institute, *Gas Stoves: Health and Air Quality Impacts and Solutions*, 2020
[4] UCLA Fielding School of Public Health, *Effects of Residential Gas Appliances on Indoor and Outdoor Air Quality and Public Health in California*, 2020
[5] UCLA Luskin Center for Innovation, *California Building Decarbonization Workforces Needs and Recommendations*, 2019
[6] NRDC, *The Other Solution to Texas' Woes: Efficiency and Heat Pumps*, 2021

Communication from Public

Name: Kimberly Orbe
Date Submitted: 11/09/2022 09:33 AM
Council File No: 22-0151
Comments for Public Posting: Dear LA City Council Members, On behalf of the undersigned organizations, we appreciate the opportunity to have been engaged in this process and support the city's building decarbonization efforts. However, we strongly believe that we have an opportunity and a responsibility to strengthen this policy. Los Angeles does not need to lock in toxic gas pollution for decades by granting exemptions in areas that already have access to the technology to decarbonize. Regretfully, we will not be participating in this council meeting to demonstrate our support as we are standing in solidarity with BLM, STAND LA, and others in calling for 'No Business as Usual' until Kevin De Leon and Gil Cedillo resign. We look forward to continuing to collaborate with you on this and other climate policies once the council is restored to working order. However, if the council wishes to move forward today, please consider our points here. We strongly urge you to reconsider the following exemptions, which we believe are unnecessary: Accessory Dwelling Units (ADUs): We recommend that attached ADUs be required to be all-electric because it will be less expensive to electrify them at this stage compared to after they are built.Additionally, recent cost-effectiveness studies generated by the California Energy Codes & Standards group confirm that all-electric construction for new single-family homes and detached ADUs is cost-effective, saving building owners money compared to a dual-fuel building. Process Gas-Manufacturing & Industrial Facilities: The initial motion introduced named the urgency to transition to zero-emission buildings and fully transition away from fossil fuels. We ask that the exemption for Manufacturing and Industrial facilities be removed and that such facilities only be granted exemptions when they can demonstrate that there aren't existing electrical alternatives, especially because this policy is for new buildings. We must remember the role that Industrial factories have played and continue to play as major contributors to air pollution, especially in communities of color. It is crucial for new Industrial Facilities to be decarbonized to secure healthy, clean air for workers and surrounding communities. Specialized Equipment-Cooking appliances in restaurants and cafeterias: Along with ADUs, this is a sector that has proven to be feasibly electrified. Wherever there exist feasible alternatives, there shouldn't be

exemptions. Lack of transparency not sufficiently addressed: The recommendations made by staff to include the language “Additional exemptions as needed” in this policy is potentially harmful. Vague language may stall the process of decarbonizing new buildings at a moment when the science and technology behind building electrification have reached a critical mass. Permitting “additional exemptions as needed” does not sufficiently empower the City to halt the procurement of fossil fuel-burning appliances. We recommend that the City follows an ‘Infeasibility Waiver Process’ model where building permit applicants may submit an infeasibility waiver that demonstrates that circumstances exist that make installation of all-electric appliances either entirely or partially infeasible. At the very least, a clear list that describes what constitutes an exemption should be provided and all exemptions should be vetted. Gas-powered systems should not be permissible where the technology to decarbonize is available to permit applicants. Good things in the recommendations we support: Continued engagement and consulting with community groups and stakeholders as well as uplifting the efforts already made by CEMO through their Equitable Building Decarbonization Report. Ready to Electrify- we support the requirement for ready-to-electrify electrical wiring and panel capacity to be required for future conversions when exemptions are granted. Collaboration between LADBS and LADWP to examine and leverage existing (and future) incentives and rebates for customers, especially those who are low-income. We thank City leadership for moving this low-cost, high-impact action forward. We look forward to supporting this ordinance and we urge the council to make these changes so that this policy will result in the most substantial health and climate benefits for all Angelenos. Sincerely, Kimberly Orbe Conservation Program Manager Sierra Club, Angeles Chapter Wes Reutimann Special Programs Director Active San Gabriel Valley Christy Zamani Executive Director Day One Michael Rochmes Green Buildings Committee Chair Climate Reality Project, Los Angeles Chapter

November 9, 2022

Los Angeles City Council
City of Los Angeles
200 N Spring St,
Los Angeles, CA 90012
Submitted via LACouncilComment.com

RE: Comments on Los Angeles Department of Building and Safety Report relative to the implementation of building decarbonization strategies in new buildings (Council File 22-0151)

Dear LA City Council Members,

On behalf of the undersigned organizations, we appreciate the opportunity to have been engaged in this process and support the city's building decarbonization efforts. However, we strongly believe that we have an opportunity and a responsibility to strengthen this policy. Los Angeles does not need to lock in toxic gas pollution for decades by granting exemptions in areas that already have access to the technology to decarbonize.

Regretfully, we will not be participating in this council meeting to demonstrate our support as we are standing in solidarity with BLM, STAND LA, and others in calling for 'No Business as Usual' until Kevin De Leon and Gil Cedillo resign. We look forward to continuing to collaborate with you on this and other climate policies once the council is restored to working order. However, if the council wishes to move forward today, please consider our points here.

We strongly urge you to reconsider the following exemptions, which we believe are unnecessary:

- **Accessory Dwelling Units (ADUs):** We recommend that attached ADUs be required to be all-electric because it will be less expensive to electrify them at this stage compared to after they are built.
- Additionally, recent cost-effectiveness studies generated by the California Energy Codes & Standards group confirm that all-electric construction for new single-family homes and detached ADUs is cost-effective, saving building owners money compared to a dual-fuel building.

- **Process Gas- Manufacturing & Industrial Facilities**: The initial motion introduced named the urgency to transition to zero-emission buildings and fully transition away from fossil fuels. We ask that the exemption for Manufacturing and Industrial facilities be removed and that such facilities only be granted exemptions when they can demonstrate that there aren't existing electrical alternatives, especially because this policy is for new buildings. We must remember the role that Industrial factories have played and continue to play as major contributors to air pollution, especially in communities of color. It is crucial for new Industrial Facilities to be decarbonized to secure healthy, clean air for workers and surrounding communities.
- **Specialized Equipment- Cooking appliances in restaurants and cafeterias**: Along with ADUs, this is a sector that has proven to be feasibly electrified. Wherever there exist feasible alternatives, there shouldn't be exemptions.
- **Lack of transparency not sufficiently addressed:** The recommendations made by staff to include the language "*Additional exemptions as needed*" in this policy is potentially harmful. Vague language may stall the process of decarbonizing new buildings at a moment when the science and technology behind building electrification have reached a critical mass. Permitting "additional exemptions as needed" does not sufficiently empower the City to halt the procurement of fossil fuel-burning appliances.
    - We recommend that the City follows an 'Infeasibility Waiver Process' model where building permit applicants may submit an infeasibility waiver that demonstrates that circumstances exist that make installation of all-electric appliances either entirely or partially infeasible. At the very least, a clear list that describes what constitutes an exemption should be provided and all exemptions should be vetted. Gas-powered systems should not be permissible where the technology to decarbonize is available to permit applicants.

Good things in the recommendations we support:

- Continued engagement and consulting with community groups and stakeholders as well as uplifting the efforts already made by CEMO through their Equitable Building Decarbonization Report.
- Ready to Electrify- we support the requirement for ready-to-electrify electrical wiring and panel capacity to be required for future conversions when exemptions are granted.
- Collaboration between LADBS and LADWP to examine and leverage existing (and future) incentives and rebates for customers, especially those who are low-income.

We thank City leadership for moving this low-cost, high-impact action forward. We look forward to supporting this ordinance and we urge the council to make these changes so that this policy will result in the most substantial health and climate benefits for all Angelenos.

Sincerely,

Kimberly Orbe
Conservation Program Manager

Sierra Club, Angeles Chapter

Wes Reutimann
Special Programs Director
Active San Gabriel Valley

Christy Zamani
Executive Director
Day One

Michael Rochmes
Green Buildings Committee Chair
Climate Reality Project, Los Angeles Chapter

Communication from Public

Name: Rebecca Ramsdale
Date Submitted: 11/09/2022 07:39 PM
Council File No: 22-0151
Comments for Public Posting: As a sustainability consultant and member of the US Green Building Council LA Chapter I support the movement towards building electrification for the following reasons: The Chapter has compiled a list of key references it will happily provide. The Chapter believes Cities should move aggressively to: ? Mandate all-electric for residential and commercial new construction. Exemptions should be extremely limited. ? Increase the percentage of required parking spaces with EV-ready infrastructure in new multi-family and office buildings. ? Require full electrification for major renovations and additions. Local ordinances requiring all-electric new buildings make sense now for the following reasons: ? Becoming mainstream: Electrification is quickly moving mainstream. Title 24, the California Building Standards, will require that all buildings be wired for electric appliances starting January 1, 2023, including heating/cooling, water heating, cooking, and clothes dryers; depending on the building type, some systems must be electric. In addition, over 50 California cities have adopted electrification ordinances or reach codes and many others are considering similar policies. ? Greenhouse gas emissions: Buildings create approximately 25 percent of California's greenhouse gas emissions, including power generation, and are a major contributor to local air pollution. Allowing the construction of additional new buildings that burn natural gas locks in decades of additional fossil fuel emissions. A recent study Rocky Mountain Institute study indicates that a delay in adopting all-electric codes will add another 3 million tons of carbon emissions by 2030. ? Occupant health, safety, equitability: Multiple studies have documented that all-electric homes are healthier for the occupants because they provide cleaner indoor air quality, which is of particular benefit for children, older adults, and other vulnerable populations. This particularly benefits people of modest means. ? Job creation: Another study shows that building electrification can lead to a net increase of over 100,000 living wage jobs statewide. ? Affordability: All-electric new buildings are affordable to build and operate. Studies have shown that the lifetime costs for all-electric homes are similar to or less expensive than mixed-fuel homes for a large majority of Californians. In addition, there are substantial utility rebates available now and more soon to be

released for efficient electric end-uses. ? High-performing technologies: High performing and efficient electric technology is available for all residential and commercial uses, including water heating, space heating and cooling, and cooktops. Key electric technologies include, heat-pumps, induction cooktops, solar photovoltaics, and energy storage. ? Developer demand: Residential and commercial developers are realizing the benefits of all-electric buildings not only for the environment but also for their bottom line. Our members across different facets of the building profession all report high client demand for high-performing all-electric buildings. ? Electric grid resilience: Electric heat-pumps can help improve the reliability of the electricity grid by facilitating the increasing percentage of renewable energy. For all these reasons, I urge that the City of Los Angeles approve the decarb motion currently before it. We look forward to working with the City on building a clean energy future.