

Correspondence

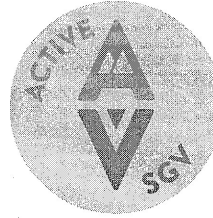
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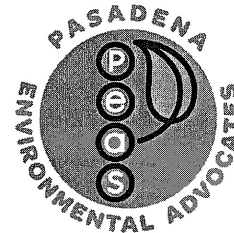
**The Climate
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LOS ANGELES CHAPTER



COMMUNITY 2.0



day one



USGBC LA
U.S. GREEN BUILDING COUNCIL LOS ANGELES

June 24, 2022

David Reyes
Planning & Community Development Department
175 Garfield Ave.
Pasadena, CA 91101
Submitted via email to davidreyes@cityofpasadena.net.
CC: Mayor Victor Gordo, Ronald Takiguchi, Guille Nuñez

RE: Implementation of Building Electrification Code Update

Dear Director Reyes,

As local organizations, community stakeholders, and Pasadena residents committed to realizing a more economically and environmentally sustainable community, we applaud the City for its intention to adopt the health and safety code requirement for all-electric construction of many categories of new buildings. To maximize the public benefit of this code update, we urge the City to take the following steps in its drafting and implementation of the building electrification policy for new construction:

1. **Narrowly define the commercial kitchen exception.** As recommended by city staff and directed by the Council, the all-electric buildings policy does not apply to food service establishments and commercial kitchens. We recommend Gas Infrastructure be allowed in commercial kitchens for cooking appliances only, and provided that the infrastructure is limited

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to the capacity necessary to operate the appliances as designed. Further, we recommend the city require commercial kitchens with Gas Infrastructure also have sufficient electric capacity, wiring, and conduit to facilitate future full building electrification. Los Angeles has this type of future-proofing language in their draft ordinance.

2. **Define new construction to include demolition of 50% or more of linear length of the walls of the building (exterior plus interior) and 50 percent of the roof.** To minimize the potential of permit applicants avoiding requirements triggered by this rule, define a timeframe of at least 3 years within which projects will be aggregated for this purpose.
3. **Create a reporting process related to this policy.** In order to consider expansion of the all-electric new buildings policy within the next year, as directed by Council, the City should create a reporting system for new construction permits that tracks the number of all new commercial, mixed use, multifamily residential, Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs), and how many of each type includes gas infrastructure. This should be tracked by month based on permit application date. All exemptions granted by the department to the all-electric new building policy should be noted. This report should be made available to the City Council and the public.
4. **Use outreach related to this policy to encourage all-electric buildings even for exempted building types.** Clarify that even though low-density residential, ADUs, and commercial kitchens are not required to have Gas Infrastructure, they are encouraged to build all-electric. Use this opportunity to note that all-electric buildings offer health benefits to residents and employees and can have cost savings, including elimination of retrofit costs in the event that existing buildings are required to transition to all-electric appliances in the future.

Thank you,

Michael Rochmes

Green Buildings Committee Chair
The Climate Reality Project, Los Angeles Chapter

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Executive Director
Active San Gabriel Valley

Ben Stapleton

Executive Director
The U.S. Green Building Council - Los Angeles Chapter

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