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City of West Hollywood Comment Letter

Additional submitted attachment is included below.



August 20, 2026

Submitted via CEC online Docket Portal: Docket Number 24-BPS-01

California Energy Commission
715 P Street
Sacramento, CA 95814 US

Re: City of West Hollywood Comments on the Draft California Building Energy Performance Strategy Report

To the California Energy Commission:

The City of West Hollywood appreciates the opportunity to review and provide comments on the Draft California Building Energy Performance Strategy Report (the “Draft Report”). We applaud the State’s commitment to climate action and leadership in developing a roadmap for decarbonizing large buildings. The City agrees that Building Performance Standards (BPS) are a critical strategy for meeting our shared climate goals and achieving the numerous co-benefits of future-proofing the building stock across California.

The City of West Hollywood has an ambitious climate goal of carbon neutrality by 2035, and on December 1, 2025, adopted its local Equitable Building Performance Standards, the second BPS policy in California. The City’s local BPS policy is critical to meeting our climate goals and improving the quality of life for our community, as promised in the City’s Climate Action & Adaptation Plan.

The City believes that partnership between the State and local jurisdictions is invaluable to achieving our climate goals and ensuring the success of a statewide strategy and local action on BPS. In that spirit, the City respectfully submits comments and recommendations on the Draft Report as follows:

1. Enable Local Action

We suggest that the CEC consider approaches that preserve statewide consistency while acknowledging and enabling early local action. For example, we recommend the State allow for grandfathering in local BPS policies that meet certain State guardrails (such as local ordinances that meet or exceed state performance targets and covered building size thresholds), allowing local jurisdictions to retain authority over larger covered buildings (over 50,000 square feet) while ensuring they continue to report benchmarking data and GHG outcomes to the CEC.

West Hollywood’s adopted BPS policy likely exceeds the State’s targets and building thresholds. Without an explicit mechanism for a local BPS exemption, this could cause confusion for our larger covered buildings (over 50,000 square feet), put undue burden on smaller covered buildings that may have fewer resources to comply (those between 20,000 and 50,000 square feet), and ultimately impede our ability to achieve our local climate goals. This uncertainty may have the unintentional effect of delaying local action. Building owners, similarly, may delay upgrades if they expect future statewide requirements to differ from local rules. The Final Report could provide a mechanism for a local BPS ordinance exemption if the ordinance meets applicable state

requirements. This would simultaneously satisfy state reporting obligations, spur local action, provide flexibility, and enable progress toward local emissions reduction commitments.

2. Expand Utility Billing Data Verification to All Covered Buildings

We strongly support the Draft Report's recommendation that the CEC use utility billing data to independently verify buildings' self-reported benchmarking data. This is one of the most valuable tools in the Draft Report, and West Hollywood encourages the CEC to apply it across all covered buildings, including those below 50,000 square feet. Statewide utility data verification would reduce the administrative burden on implementing jurisdictions and the financial and staff-time burden on covered building owners, without requiring the State to assume direct administration of buildings that local governments are prepared to manage.

To streamline compliance for building owners, the Final Report could recommend a mechanism under which compliance with a local BPS ordinance that meets applicable state requirements satisfies state reporting obligations.

3. Streamline BPS Administration and Implementation with Local Jurisdictions

The City of West Hollywood has been collaborating with the City of Santa Monica and Los Angeles County on a regional approach to BPS. The City encourages the State to consider opportunities to maintain consistency across the State while also supporting and aligning with these regional coordination efforts, including the California BPS Cohort.

For example, there is currently a patchwork of third-party-implemented programs across the state that address energy performance, requiring building owners to coordinate with multiple program implementers, each with their own applications and onboarding processes. The City recommends that the Strategy Report includes recommendations to consolidate and/or fund technical and financial assistance to help covered building owners across the state benchmark and meet performance targets. We also suggest exploring opportunities to provide local jurisdictions with State resources to implement benchmarking and BPS, including software, to achieve economies of scale, minimize confusion for building owners, and reduce administrative burdens on local staff.

We commend the CEC for its leadership in accelerating building decarbonization and climate action in ways that meet the needs of local jurisdictions, building owners, and communities across the State. Thank you for the opportunity to provide input on the Draft Report and for your consideration of our comments. We look forward to our continued collaboration on advancing building performance standards in California.

Respectfully,

Tahirah Farris

Tahirah Farris
Acting Long Range Planning Manager
City of West Hollywood
TFarris@weho.gov