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LA County Chief Sustainability Office - comment letter

Additional submitted attachment is included below.

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August 21, 2026

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

California Energy Commission
715 P Street
Sacramento, CA 95814 US

**Re: Comments on Draft California Building Energy Performance
Strategy Report**

Dear CEC Team,

Thank you for the opportunity to review and provide comments on the Draft California Building Energy Performance Strategy Report. We appreciate the State's leadership in advancing an ambitious vision for decarbonizing the largest buildings across California, and we strongly support the State's conclusion that Building Performance Standards (BPS) are an effective approach for meeting our shared climate goals in a way that is flexible and cost-efficient. The State's strategy report provides a valuable strategic roadmap that jurisdictions such as Los Angeles County can leverage to inform local efforts and accelerate progress on building energy performance and building decarbonization.

LA County's own climate goals are closely aligned with the draft report. The LA County 2045 Climate Action Plan (CAP) sets a goal of reducing the County's GHG emissions by 83 percent below 2015 levels. Achieving this goal requires meaningful progress in decarbonizing existing buildings – one of the five “core” measures in the CAP. Similarly, the OurCounty Sustainability Plan includes Action 25, “Adopt a Building Performance Standard, along with benchmarking policy and supporting reach codes, for buildings at least 20,000 square feet and greater, working collaboratively with jurisdictions across the region.” LA County has also been working with the cities of West Hollywood, Santa Monica, Los Angeles, and others as part of the USGBC California BPS Peer-Learning Collaborative (CalBPS) to help advance shared goals across jurisdictions and sectors.

Based on our own work exploring options for existing building decarbonization, our office respectfully offers the following comments on the Draft California Building Energy Performance Strategy Report:

Provide a pathway that supports early local action.

The CEC's report recommends a single statewide policy for buildings over 50,000 square feet. However, because further detail on the statewide program's targets, metrics, and timelines is still forthcoming, this creates uncertainty about when and how local jurisdictions should take action. With fewer than twenty years left until our shared 2045 climate targets, every year of available runway matters for feasibility and cost-effectiveness. Early local action provides building owners more time to plan investments, reduces long-term compliance costs, and accelerates progress toward statewide climate goals.

State–local partnership is essential to achieving California's decarbonization targets. We respectfully request that the CEC consider approaches that preserve statewide consistency while enabling jurisdictions ready to act now to begin implementation. For example, the State could consider “grandfathering” local BPS programs that meet state-defined guardrails (such as alignment with 2045 performance targets) or establish an equivalency pathway through which compliant local BPS programs serve as an alternate route to statewide compliance. These approaches would allow local innovation and early action without creating compliance duplication for building owners.

Consider resources to streamline state and local compliance.

Our office appreciates the Draft Report's recognition that a successful statewide program will require clear and consistent policies and data. We see significant opportunity for the State to support local jurisdictions by providing shared resources that streamline reporting, verification, and administrative workflows. For example, the State could consider developing:

- **A model California BPS framework for buildings between 20,000 and 50,000 square feet**, which many jurisdictions are considering covering. This would help align local program design with State goals while expanding the reach of building performance efforts statewide.
- **Access to a shared statewide administrative platform**, enabling building owners to view both state and local compliance information in one place. A unified interface would minimize confusion, reduce duplicative reporting, and support consistency for building owners with portfolios spanning multiple jurisdictions.
- **Guidance on utility-verified benchmarking data availability**, including whether and how utility billing data verification could be expanded in the future. Clear guidance would help jurisdictions understand when local programs can rely on statewide verification systems and when additional data infrastructure may be required.

Providing these tools and platforms would allow local programs to align more closely with statewide policy while still maintaining the flexibility needed to cover additional buildings, start earlier, and tailor approaches to local conditions.

We appreciate the State's leadership in advancing a comprehensive and forward-looking approach to large building decarbonization. The draft report provides a strong foundation, and we believe the refinements suggested above can further strengthen its alignment with local conditions and long-term outcomes. Continued State and local collaboration will be critical to achieving our shared climate goals.

Thank you again for the opportunity to provide input, and please do not hesitate to contact our office with any questions regarding these comments. We look forward to continued collaboration as this work moves forward.

Respectfully submitted,



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