

**DOCKETED**

<b>Docket Number:</b>	22-BSTD-07
<b>Project Title:</b>	Local Ordinance Applications Exceeding the 2022 Energy Code
<b>TN #:</b>	259975
<b>Document Title:</b>	City of Santa Monica Cover Letter
<b>Description:</b>	Plain text of City of Santa Monica application cover letter to CEC
<b>Filer:</b>	Anushka Raut
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	11/12/2024 1:35:29 PM
<b>Docketed Date:</b>	11/12/2024



October 15, 2024

Attn: Mr. Drew Bohan, Executive Director  
California Energy Commission  
1516 Ninth Street  
Sacramento, Ca 95814-5514

Electronic Delivery to: Anushka Raut at [title24@energy.ca.gov](mailto:title24@energy.ca.gov)

**Re:** Application for Approval of Local Amendments to the California Energy Code

Dear Mr. Bohan:

Please be advised that the Santa Monica City Council has adopted amendments to the 2022 Edition of the California Building Energy Efficiency Standards Code via Ordinance No. 2790, enclosed.

In accordance with Public Resources Code Section 25402.1 (h)2 and Section 10-106 of the Building Energy Efficiency Standards, this package of materials includes the City of Santa Monica proposed local ordinance requiring:

- a) The standards are cost effective and;
- b) The standards have more stringent energy requirements than those set by California's 2022 Building Energy Efficiency Standards Title 24, Part 6.

At its regular meeting on September 10, 2024, the Santa Monica City Council approved the first reading of the enclosed Energy Performance Approach Reach Code amending the 2022 California Energy Code, Title 24, Part 6. The ordinance was adopted at the second reading on September 24, 2024. The City Council made the determination that mandating the enclosed ordinance is cost-effective based on a cost effectiveness study prepared by the California Energy Codes and Standards team. The ordinance will become effective following approval by the California Energy Commission.

Please find the following materials enclosed:

- Att. 1: This cover letter
- Att. 2: Staff Report to the Santa Monica City Council, outlining the goals of the updating building standards
- Att. 3: Signed Energy Performance Approach Ordinance No. 2790 making local amendments to Title 24, Part 6 by requiring energy performance standards that exceed the Title 24 baseline for new residential and non-residential construction. This provides clear requirements that buildings be designed to consume no more energy than permitted by Part 6.
- Att. 4: Energy Performance Approach Ordinance showing markups to distinguish the amendment text from the published text of Title 24;
- Att. 5: Signed Energy Performance Approach Resolution 1612, which

includes the necessary CEQA findings pursuant to Section 15061(b)(3) and Section 15308;

- Att. 6: Evidence of CEQA compliance through the attached Notice of Exemption; and
- Att. 7: 2022 Cost-Effectiveness Study prepared by the California Energy Codes and Standards team documenting that the adopted requirements have been found to be cost-effective for Climate Zone 6.

The Santa Monica City Council approved Resolution 1612 on September 10, 2024 regarding CEQA findings pursuant to Section 15061(b)(3) and Section 15308 of the CEQA Guidelines. The Energy Performance Approach Ordinance is exempt from CEQA under Section 15061(b)(3), which states that CEQA does not apply, “where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.” These standards are more stringent than the State energy standards, and as such, there are no reasonably foreseeable adverse impacts, and there is no possibility that the Ordinance in question may have a significant effect on the environment. In addition, Section 15308 exempts actions taken by regulatory agencies for protection of the environment (Class 8). The Ordinance would help to achieve the intended outcome of low-emission new buildings, and therefore, is exempt pursuant to Section 15308.

The City of Santa Monica would like to express to you our firm commitment to enforce the 2022 Title 24, Part 6 Building Energy Efficiency Standards of the California Building Code as part of the implementation of our local energy ordinance. The Energy Performance Approach ordinance will ensure that residential and non-residential buildings in the City will consume less energy than permitted by Title 24, Part 6.

If you have any questions, please contact Senior Sustainability Analyst Ariana Vito at [ariana.vito@santamonica.gov](mailto:ariana.vito@santamonica.gov). Thank you for your consideration.

Sincerely,



Shannon Parry, Chief Sustainability Officer  
City of Santa Monica