

**DOCKETED**

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**HGA Comment on 2022 Energy Code Pre-Rulemaking**

*Additional submitted attachment is included below.*

October 5, 2020

Writer's Direct Dial 415-814-6947

Dear Public Advisor –

**Re: Docket #:19-BSTD-03**

On behalf of my firm, HGA, I request that these comments be read aloud in the hearing tomorrow:

The time has come for our energy code to have a much stronger approach to climate change. As a Bay Area resident for over 30 years, I am acutely aware of the changes in our regional climate, and my industry has the capacity to do more in advocacy and in the design of our buildings. It's time to stop burning fossil fuels inside our buildings and shift to all electric (or at minimum, for heating and cooling). I have designed two notable all-electric buildings in the Bay Area: The Exploratorium at Pier 15, and the David and Lucile Packard Foundation headquarters, that we found to be cost effective, reliable and robust. It's encouraging to see this trend increasing.

HGA supports CEC's expansion of rooftop solar to more building types. HGA designed the all-electric Science Complex at Los Angeles Harbor College with roof-mounted PVs and we recently completed the Net Zero Energy Westwood Hills Nature Center in St. Louis Park, MN which will not only operate electrically, but share this story and its use of rooftop solar with the local population through interpretive exhibits.

We support a single electric baseline for all buildings, and most of our clients are headed in this direction. It's generally less expensive to go all-electric due in part to utilizing only one energy infrastructure, rather than two. The time to act is now, as T24 2022 would go into effect in 2023, but it can take years for permit through construction, so new buildings will still be opening with gas as late as 2026. Building new mixed fuel buildings only puts off the inevitable. Design right now in alignment with our 2045 carbon neutral goals to avoid far costlier and more disruptive retrofits later. Ratepayers are still subsidizing new gas infrastructure, yet the State of California is committed to 100% clean energy by 2045. This infrastructure will not be paid off by then. Let's also not forget that far more damage occurred in the 1906 earthquake as a result of fires caused by gas line breaks. As earthquakes pose a constant threat, let's eliminate this infrastructure liability now with a safer approach.

Fires aside, California tops the charts for most polluted air in the US, and buildings are significant contributors to this problem. Buildings in California use more gas than powerplants, but buildings don't have pollution controls, and so they emit 7 times more pollution. We need to align our thinking with the Governor's recent announcement to phase out gasoline powered cars by 2035 and put that same urgency towards our electricity consumption in our built environment. We can no longer pick and choose the industries to which we make this

effort and need a cohesive approach to reducing fossil fuel dependency and shifting our energy sources in all departments and levels of government.

Lastly, safety and welfare of building occupants is of paramount concern to all practicing architects. Recent research has shown that combustion inside the home is particularly concerning for health impacts and the pollution generated disproportionately affects low income and communities of color that are already overburdened with pollution. We support a just transition from fossil fuels with policies that protect workers and low-income communities.

We advocate for a stronger approach, investing now in building the right way for the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marc L'Italien', with a long horizontal flourish extending to the right.

Marc L'Italien, FAIA, LEED AP  
Design Principal