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WRNS Studio Comment on 2022 Energy Code Pre-Rulemaking

Hello and thank you for this opportunity to provide comment.

As a partner of WRNS Studio, an architectural and planning firm with headquarters based in San Francisco, I am writing to ask that you consider much clearer and stronger language and benchmarks to direct the building industry to design WITHOUT fossil fuels. As a lifelong practicing California architect, I have seen the tremendous benefit from California code leadership in areas of fuel efficiency, air quality and health. Please take this opportunity to continue to lead by requiring the quick phasing out of fossil fuels given the short timeline we now have to make positive change.

In the last five years, our firm has designed numerous public and private projects that did not depend on gas for building systems. The results have been award winning, and more importantly, healthy and comfortable for the user and community. While there is often initial pushback, the pushback we have experienced often disappears when the client or developer understand the cost benefit of a simpler set of utilities and the availability of market ready systems for heating, cooling and cooking. In order to leverage this experience, and the numerous other projects designed and built by others in our area, we ask that you support a single electric baseline for all buildings, sending a message of commitment to combating climate change and an understanding that the technologies are already in the market to support this goal and result.

Building new mixed fuel buildings is creating more buildings that will need retrofits to meet our 2045 carbon neutral goals. Retrofits are more expensive and are difficult in occupied building. Since buildings are long lived assets with 50-75 year lifespan vs ~12 for cars and appliances, we need to get started on building with all electric right quickly. Our office is currently designing an all electric affordable housing project near the San Francisco Civic Center. If a project that is typically budget stressed can make this commitment, I believe other clients and program types can too.

Please consider clear language that supports a just transition from fossil fuels with policies that protect workers and low income communities.

Thank you for consideration and time, Pauline Souza for WRNS Studio

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