

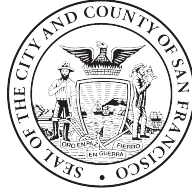
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*Comment Received From: Rafael Mandelman, San Francisco Board of Supervisors
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All-Electric Building Code Docket No 19-BSTD-03

Additional submitted attachment is included below.

Member, Board of Supervisors
District 8



City and County of San Francisco

RAFAEL MANDELMAN

November 30, 2020

California Energy Commission

Docket Office, MS-4

1516 Ninth Street

Sacramento, CA 95814

docket@energy.ca.gov

Re: All-Electric Building Code Docket No. 19-BSTD-03

Dear Honorable Commissioners,

As a member of the San Francisco Board of Supervisors, I am writing to urge the California Energy Commission to establish building standards that will align with our state's bold climate action goals and ensure safer, healthier buildings for generations to come by prohibiting the use of natural gas in new construction, and adopting an all-electric building code in 2022.

San Francisco recently joined the growing list of California cities that have already taken this and similar steps to eliminate the dangers and climate impacts of natural gas in our buildings. In San Francisco, natural gas is the second largest source of greenhouse gas emissions, accounting for over 40% of our total. Over 80% of all emissions generated by our building stock are attributed to the use of natural gas, a fuel source mostly comprised of methane which has 86 times the greenhouse gas effect of carbon dioxide. In the 1989 Loma Prieta earthquake that struck the Bay Area, over half of all the fires that burned in San Francisco were caused by gas line ruptures, and we just marked the 10th anniversary of the tragic gas explosion in neighboring San Bruno that destroyed an entire neighborhood and killed eight people. In northern California alone, more than one gas leak or gas emergency is reported every minute. Natural gas is also a serious public health concern, with studies showing that children raised in homes with a gas range are up to 42% more likely to develop asthma.

These are some of the reasons why my colleagues joined me earlier this month in unanimously passing an all-electric requirement for new buildings that submit permits after June 1, 2021 with very limited exceptions where the technical infeasibility of a particular building system can be demonstrated by third party review and a waiver for some cooking facilities in new buildings where there is a demonstrated business need to include gas utilities. This ordinance represented the culmination of over a year of stakeholder engagement that brought together builders, engineers, affordable housing developers, labor, and community advocates. Based on these conversations I am convinced that all-electric construction is not only feasible, but essential to achieving a carbon-neutral future.

As you undertake your own effort to make California a leader in building decarbonization, I urge you to look to San Francisco's approach. In addition to the limited feasibility and cooking exceptions mentioned above, which still require that the building be constructed as electric-ready to allow for future conversions to all-electric technologies, we also found a path to ensure a just transition for laborers in the plumbing and pipefitting trades whose jobs installing gas piping will be impacted by electrification. Solving the climate crisis should be a positive-sum effort, and we addressed these concerns by requiring that our water reuse and alternative water supply standards be evaluated concurrently with the

implementation of all-electric requirements so that opportunities for natural resource conservation and continued skilled workforce opportunities could be realized as part of our electrification efforts.

This has been a trying year on many levels, not least because of the devastating wildfire season we experienced throughout the state. Here in the Bay Area, we had a record string of hazardous air quality days and the smoke became so overwhelming that at one point the sun was actually blocked for an entire day. It was a moment of realization and reflection for many of us that, if there had been any lingering doubt, the climate crisis has fully arrived in California. Building decarbonization is just one of the many critical steps we must take to preserve a future for our state and our children, and I urge you to follow the example of San Francisco and dozens of California cities by adopting an all-electric code in 2022 and working with state lawmakers to prohibit future natural gas infrastructure as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'RJM', with a stylized flourish at the end.

Rafael Mandelman
San Francisco Board of Supervisors