

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	237020
Document Title:	Napa Climate NOW! comments on Proposed 2022 Building Code, Docket No 19-BSTD-03
Description:	N/A
Filer:	System
Organization:	Napa Climate NOW!
Submitter Role:	Public
Submission Date:	3/6/2021 6:45:24 AM
Docketed Date:	3/8/2021

*Comment Received From: Napa Climate NOW!
Submitted On: 3/6/2021
Docket Number: 19-BSTD-03*

**Napa Climate NOW! comments on Proposed 2022 Building Code,
Docket No 19-BSTD-03**

Additional submitted attachment is included below.



Advocating for smart climate action based on the latest climate science

March 5, 2021

California Energy Commission
Efficiency Division – Buildings Energy Efficiency Standards Program
Docket No 19-BSTD-03
1516 Ninth Street
Sacramento, CA 95814

Re: Napa Climate NOW! comments on Proposed 2022 Building Code, Docket No 19-BSTD-03

Napa Climate NOW!, a non-partisan grassroots organization working on climate action in Napa County, is writing to request that the CEC mandate an all-electric standard for new residential construction throughout the state in order to reduce the installation of additional natural gas infrastructure and help California meet its GHG emissions reduction goals.

Natural gas appliances require that a separate gas pipeline infrastructure be built and maintained. But gas pipelines and storage tanks can leak, and sometimes rupture. The massive Aliso Canyon storage tank blow-out of 2015 was the single largest natural gas leak in U.S. history, releasing more than 100,000 metric tons of methane. Another infamous incident was the gas pipeline rupture in San Bruno in 2010 that killed eight people, injured 58 and destroyed 38 homes. Gas lines are also a serious hazard during earthquakes, since damaged pipes can leak and ignite (<https://www.earthquakecountry.org/step1/gassafety/>).

A 2017 study by the San Francisco Department of the Environment reviewed reports of natural gas leakage rates and found the average to be 4.5% with a high of 12%. The report recommended “fuel switching” to electricity rather than spending funds repairing and replacing gas lines, and prioritizing “decarbonization” for buildings by moving away from fossil fuels toward renewable energy sources, like solar.

Methane, the largest constituent of natural gas, is a greenhouse gas much more powerful in warming the atmosphere than carbon dioxide. A ton of methane is 150 times more potent than a ton of carbon dioxide during the first year of emission, or about 80 times more potent than CO₂ when compared over 20 years (<https://www.ccacoalition.org/en/slcp/methane>), as recognized by the California Air Resources Board (CARB). Reducing methane emissions in the near-term is widely recognized as one of the most important strategies for slowing global warming and avoiding climate catastrophe.

Indoor air quality is also impacted by the use of natural gas appliances. According to CARB, natural gas stoves can release carbon monoxide, formaldehyde and other harmful pollutants. The Rocky Mountain Institute found the “homes with gas stoves can contain approximately 50

**NAPA CLIMATE
NOW!**
A 350 Bay Area Group

Advocating for smart climate action based on the latest climate science

to 400 percent higher concentrations of NO₂ than homes with electric stoves, often resulting in levels of indoor air pollution that would be illegal outdoors,” according to [an article](#) published in *The Atlantic*.

Napa is a rural county with a small population and a state requirement to increase housing density. It doesn't make economic or environmental sense for Napa to build housing with solar photovoltaic systems to supply clean energy on the one hand, while continuing to expand natural gas piping and fossil fuel use on the other. Help our county and cities build healthier and more affordable housing by making that housing all-electric.

Thank you,

The Steering Committee of Napa Climate NOW!

Dave Kearney-Brown, Lynne Baker, Chris Benz, Lori Stelling, Linda Brown, Jim Wilson