

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	237066
Document Title:	Now is the Time to Lead on Climate, & Buildings are Front and Center
Description:	N/A
Filer:	System
Organization:	STUDIOS architecture
Submitter Role:	Public
Submission Date:	3/9/2021 1:57:30 PM
Docketed Date:	3/9/2021

Comment Received From: STUDIOS architecture
Submitted On: 3/9/2021
Docket Number: 19-BSTD-03

Now is the Time to Lead on Climate, & Buildings are Front and Center

Dear Commissioners of the California Energy Commission,

California has a history of leading on the issues that end up defining the future. There is perhaps no greater problem in the world right now than that of the climate crisis. As the building industry accounts for roughly 40% of total carbon emissions, this puts the building sector front and center in the global fight to protect our future. Why is it pertinent that we put an all-electric building requirement in the code now? Firstly, because we know it is the moral and ethical thing to do. It may not be the easy choice, but it is the right one. It is California's™ obligation, as a global leader, to enforce the changes that will decrease our carbon emissions prior to 2030 when the science says we can still avoid the most drastic negative impacts of climate change. We cannot wait another 3 years for this to become more obvious; when our climb will be up a much steeper grade. We have the technology to do this on virtually all project types now, and it is affordable. We know because we do it every day with our clients who are also, Leaders.

Beyond the role of leadership and the long-term impacts to the climate that are of existential importance to life on earth, there are also some shorter-term impacts that should be clarified:

Firstly, combusting natural gas in an enclosed space creates air quality that would be illegal per the EPA if it existed outside. Continuing to allow natural gas and fossil fuels in new buildings will negatively influence the health of every occupant in every building powered by natural gas, propane and other fossil fuels. The developers and local jurisdictions that understand this impact have been steering clear for years. Of course, without a statewide mandate, those who are less fortunate will not have a choice, so there is also a social equality aspect to this decision.

Secondly, continuing to allow the construction of gas infrastructure, aside from being more expensive, will only set them up for long term failure as they are forced in the future to redesign their systems once gas is either no longer available, or too expensive to justify. PG&E itself has publicly stated, in a letter that we reference to many of our clients, that they plan for gas infrastructure as a stranded asset in California. Not including an all electric building requirement will cost Californians more, and continue the excessive waste associated with carbon based energy sources. Gas infrastructure is more expensive, and will only get more expensive as this finite resource becomes more scarce and demand goes down.

In closing, as you are all well aware, the building code is fundamentally in place to

protect the health and wellbeing of our citizens. This issue touches on the health, economic success, social equality, and long-term quality of life for our states citizens. It is the duty of the code to force the industry to slightly change how it builds. To force us to be better. To protect the wellbeing of our citizens in all of these ways. I plead for you, the members of the CEC to reconsider your recommendation and include an all-electric standard in the upcoming code update.

Sincerely,

Justin Glover, AIA LEED AP
Associate Principal
STUDIOS architecture