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November 8, 2021

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Pasadena City Hall

100 North Garfield Avenue, Room S249

Pasadena, CA 91101

### **Re: BIA-LAV Comment Letter – City of Pasadena Electrification of Newly Constructed Buildings**

Dear Chair & Councilmembers,

The Los Angeles/Ventura Chapter of the Building Industry Association of Southern California, Inc. (BIA-LAV), is a non-profit trade association focused on building housing for all. On behalf of our membership, we are submitting this letter to share our concerns based on the “Electrification of Newly Constructed Buildings” draft ordinance. We hope that our feedback is evaluated and considered before a formal policy is adopted. **We are asking that all residential construction be exempt from this ordinance, including Accessory Dwelling Units (ADUs), as mentioned in the staff report. Additionally, we believe there should be a robust stakeholder process to discuss the impacts of this item and explore other alternatives such as incentives and voluntary programs as a part of this planning strategy.**

BIA-LAV and our members have been ardent supporters of the sustainability goals described in this staff report. In fact, new construction has led the way in the adoption of natural resource resiliency, and energy efficiency. Particularly, California and Los Angeles County have some of the highest environmental standards in the Country; CALGreen is the first-in-the-nation mandatory green building standards code and the Building Energy Efficiency Standards, Title 24, Part 6 & Part 11 update (Energy Standards) include mandated solar for all new housing construction. Also, according to the California



Energy Commission (CEC), the Energy Standards are a unique California asset that have placed the State at the forefront of energy efficiency, sustainability, energy independence, and climate change issues. This region has provided a template for national standards within the United States, as well as for other countries around the globe. It is our goal to work with staff and City officials in striking the right balance of environmentally sustainable practices that also allows for the fair production of housing.

By exploring a required electrification policy and other natural gas restrictions for newly constructed buildings, these mandates stand to add more hurdles to the permitting and building processes. New construction is actively decreasing carbon emissions and is already on track to meet the State's aggressive goals and reduction targets. These include the reduction of goals for greenhouse gas (GHG) emissions to 40 percent below 1990 levels by 2030, and carbon neutrality by 2045. Buildings already have to be in compliance with the CALGreen building code and in January of last year the State adopted its most recent triannual building code updates. The CEC states that the latest codes, cut energy use in new homes by more than 50 percent. As a result of these actions, the CEC equates the reduction of GHG emissions to taking 115,000 fossil fuel cars off the road. Currently, we depend on the availability of natural and renewable gas to provide Californians with energy affordability, choice, and reliability through diversified energy options; this creates consumer confidence for those purchasing and renting homes. Trying to move above and beyond these standards without the readiness of technology or infrastructure would be unproductive. If a residential exemption is not adopted, we would prefer to see this goal begin as a voluntary, incentive-based approach, instead of a mandate.

As the City evaluates electrification, there should be a focus on strategies that allow for market driven preferences and economic feasibility within the development of residential building. We cannot lose sight that the State and the region are experiencing a housing and homelessness crisis. According to the Southern California Association of Governments (SCAG) the City will be responsible for the creation of nearly 9,500 homes as a part of their Regional Housing Needs Assessment (RHNA) allocation to meet the housing shortfall. In tandem with the electrification goals, the City should also be working on efforts to increase home ownership attainability, housing affordability and stopping rising homelessness. If the policies within this draft electrification ordinance make it harder to build housing or to provide housing opportunities, those actions should be reevaluated within this scope to ensure that the City's housing needs are still being met. We suggest the application of a housing feasibility/impact analysis or study when evaluating the implementation of this policy.

**For the reasons stated above, we are requesting that residential construction be exempt from this ordinance, that a stakeholder process be incorporated, incentives and voluntary-**



Los Angeles/Ventura Chapter

**approaches be considered and further review of the impacts to housing development be evaluated.** BIA-LAV believes that this feedback will provide balance to the current draft policy direction. There will be ample opportunity ahead for the City to reshape the proposed plan into a functional, meaningful tool by which to address electrification goals. Should you have any questions, please contact BIA-LAV Vice President, Diana Coronado, at [dcoronado@bialav.org](mailto:dcoronado@bialav.org).

Sincerely,

Diana Victoria Coronado  
Vice President  
BIA - Los Angeles/Ventura

*Sent via e-mail*

CC:

David Reyes, Planning and Community Development Director  
Gurcharan Bawa, General Manager  
Lisa Hosey, Assistant City Attorney  
Valerie Flores, Recording Secretary