



December 19, 2022

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700 H Street, Suite 1450
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Sent via email

RE: Support of County of Sacramento Early Action for New Construction Electrification Ordinances

Dear County Supervisors,

In advance of the final release of the County's Climate Action Plan (CAP), we recommend the Board of Supervisors implement the draft CAP's excellent measures for all-electric new buildings.

County Climate Action Plan measures GHG-05 (commercial) and GHG-07 (residential) call for ordinances to require all-electric construction by 2023 for new low-rise buildings and 2026 for new larger buildings. The measures are included below for your reference.

The City of Sacramento approved a nearly identical ordinance last month, for implementation during the same timeframes as the County CAP measures. The City ordinance is consistent with the California Green Building Standards Code, and was preceded by public workshops, stakeholder meetings and technical reviews – all of which will help to provide guidance for such ancillary issues as technical exemptions and appeal processes.

We note that County staff is already primed for this task. The County has signed onto an MOU on collaborative electrification efforts with both the City and SMUD, and has also created a task force to advise on this subject and other climate actions.

Although a January 2023 start for the measures may no longer be viable, we request you direct staff to prepare the necessary ordinance language and rationale for public review and Board approval shortly thereafter. Taking this decisive action now – without waiting for the CAP – will signal that the County, like the City of Sacramento and many other State municipalities, is ready to move forward with meaningful climate action.

Sincerely yours,

Herman Barahona


Herman Barahona
Lead Community Organizer
Environmental Justice Coalition

Edith Thacher

Edith Thacher
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cc: Sacramento County Climate Emergency Mobilization Task Force
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From Sacramento County Draft Climate Action Plan, Measures GHG-05, GHG-07 referenced above

MEASURE GHG-05: INCREASE ENERGY EFFICIENCY AND ELECTRIFICATION OF NEW COMMERCIAL/NONRESIDENTIAL BUILDINGS OR FACILITIES

Measure: The County will develop a reach code requiring new commercial and nonresidential buildings obtaining building permits to meet the following requirements:

- ▶ building permit applications filed on or after January 1, 2023, or 6 months after the availability of a cost-effectiveness study prepared by the Statewide Reach Codes Team, whichever is later, for newly constructed buildings that are three stories or less to be all-electric buildings;
- ▶ building permit applications filed on or after January 1, 2026, or 6 months after the availability of a cost-effectiveness study prepared by the Statewide Reach Codes Team, whichever is later, for newly constructed buildings that are four stories or more to be all-electric buildings; and
- ▶ limited exemptions for specific uses, available only for building permits filed on or before December 31, 2025, provided that the associated GHG emissions are offset through an accredited local carbon offset program:
 - a limited exemption for food establishments for cooking equipment only;
 - a limited exemption for manufacturing process loads within a manufacturing or industrial facility¹⁴;
 - a limited exemption for essential medical facilities, such as hospitals that may require natural gas;
 - a limited exemption for regulated affordable housing when virtual net energy metering is not available, for water heating only; and
 - if the technology to require construction of an all-electric building for ground floor food service establishments, manufacturing or industrial facilities, essential medical facilities, or regulated affordable housing is not feasible and available by July 1, 2025, the Board of Supervisors may consider extending the limited exemption until the technology is feasible and available.

MEASURE GHG-07: ELIMINATE FOSSIL FUEL CONSUMPTION IN NEW RESIDENTIAL BUILDINGS

Measure: The County will require prewiring for all-electric appliances and equipment in all mixed-fuel new single-family dwellings and multi-family buildings constructed prior to January 1, 2023, effective upon adoption of this CAP. The County also will require all new residential construction in the County to be all-electric per the following requirements subject to cost-effectiveness studies prepared by the Statewide Reach Codes Team:

- ▶ building permit applications filed on or after January 1, 2023, or 6 months after the availability of a cost-effectiveness study prepared by the Statewide Reach Codes Team, whichever is later, for newly constructed residential buildings that are three stories or less to be all-electric buildings; and
- ▶ building permit applications filed on or after January 1, 2026, or 6 months after the availability of a cost-effectiveness study prepared by the Statewide Reach Codes Team, whichever is later, for newly constructed residential buildings that are four stories or more to be all-electric buildings.

Implementation: Develop and adopt an energy reach code no later than December 2022, or 6 months after the availability of a cost-effectiveness study prepared by the Statewide Reach Codes Team, whichever is later, requiring all new single-family and low-rise and mid-rise multi-family residential buildings obtaining building permits, to be designed as all-electric buildings. Development of the energy reach code will include cost-effectiveness studies and feasibility analyses that should include at a minimum consideration of supply chain availability of parts, prices of component parts, and previously approved projects for which natural gas lines may already be constructed. Detailed feasibility criteria will be developed during development of the energy reach code. In addition, the County will periodically re-assess and update reach codes in response to updates to the building code.

Examples of draft criteria for when residential buildings will not be subject to the all-electric requirement are described below:

- ▶ Projects in progress
 - New subdivisions or planned unit development that has existing natural gas infrastructure that is already substantially built on the date of adoption of the reach code.
 - Architectural master plans for the subdivision that have been submitted to the County for design review prior to the date of adoption of the reach code.
- ▶ Cost feasibility: Where a project applicant can reasonably demonstrate that the cost of providing an all-electric home would add 50 percent to the cost of the like-sized component parts above the costs of installing natural gas appliances, including available incentives and the cost of natural gas infrastructure.
- ▶ Supply chain feasibility: Where a project applicant can reasonably demonstrate that all-electric parts required for home sale cannot be acquired from a manufacturer within 120 days.
- ▶ Affordable housing: A limited exemption for regulated affordable housing when virtual net energy metering is not available, for water heating only.

In addition, new development projects that have incorporated all feasible on-site GHG mitigation may be permitted to contribute financially toward the electrification programs for existing buildings in Measures GHG-04 and GHG-06 subject to quantification of the costs per MT CO₂e.