



May 23, 2022

The Honorable Bob Archuleta
1021 O Street, Suite 6720
Sacramento, CA 95814

RE: SB 1393 (Archuleta) Oppose

Dear Senator Archuleta:

The City of Santa Rosa must **respectfully oppose** your bill SB 1393, which would create a new statewide review process for local governments to receive approval from the California Energy Commission (CEC) to adopt local ordinances regarding decarbonizing buildings switching from the use of fossil fuels to electricity for heating and other building energy uses.

Climate change is an urgent threat to the health and well-being of California's residents and economy. California cities and counties are critical partners with the state in achieving our shared climate change, emission reduction, and clean energy goals, including residential and commercial building decarbonization. Per the updated 2022 Energy Code¹, the California Energy Commission encourages building electrification as consistent with and supportive of important statewide goals for decarbonization. SB 1393 would unnecessarily inhibit the ability of cities to accelerate the reduction of emissions of greenhouse gases through adding additional reporting and approval processes.

The statewide review process described in SB 1393 raises some concerns around consistency as it only requires local electrification ordinances to undergo review by the CEC if they do *not* include certain exemptions. Local electrification ordinances that include certain exemptions, regardless of how they are drafted, would not be subject to review or oversight. Such a double standard is atypical for statewide review processes, and only serves to add more "green tape" as a barrier to local climate change mitigation initiatives.

On November 19, 2019, the City of Santa Rosa passed a reach code that would require all new residential construction of 3-stories and below in the City to be all electric. Santa Rosa was one of the first cities in the country to adopt this type of reach code ordinance. The City created the Climate Action Subcommittee, which is charged with providing guidance and oversight of the implementation and update of the City's Municipal Climate Action Plan and the Community

¹ [2022 Building Energy Efficiency Standards](#)



Climate Action Plan with a goal of reducing the local greenhouse gas emissions and ensuring long-term sustainability and resilience from climate change and its effects. The development of the City's reach code was approved by the Climate Action Subcommittee and ultimately the full council. Further, the California Energy Commission also reviewed and approved our reach code ordinance.

One avenue to pursue that goals of a climate action plan is the reduction of burning of fossil fuels, including natural gas, in new developments and redevelopment of existing structures. In addition to reducing fossil fuels, all-electric buildings can be safer and healthier to work and are cost effective, especially when designed at the new construction stage. As you may know, by constructing an efficient, all electric building, costs can be reduced by avoiding paying for natural gas infrastructure. Compared to a mixed fuel home, building all-electric home can typically save \$6,171 per single family home and \$3,361 for multifamily.² The technologies and design strategies needed to create efficient electric buildings are available today.

Finally, existing California case law establishes that as long as there is no conflict between municipal ordinances and state law, cities and counties may impose additional requirements within their jurisdictions and finds that cities and counties may impose regulatory requirements that are more stringent than state and federal statutes. As such, The City of Santa Rosa encourages the Legislature to not add additional "green tape," and make it easy for local governments to have the ability to accelerate the reduction of emissions of greenhouse gases in their communities to meet our shared climate resiliency goals.

For these reasons, the City of Santa Rosa **opposes** SB 1393.

Sincerely,

Chris Rogers, Mayor

CC: Senator Mike McGuire
Assemblymember Marc Levine
Assemblymember Jim Wood

² [2019 Cost-effectiveness Study: Low-Rise Residential New Construction. July 17, 2019. California Energy Codes and Standards Program.](#)