January 23, 2023
City of San Carlos
600 Elm Street
San Carlos, CA 94070

RE: January 23rd City Council Agenda Item 9.a: Discuss and Provide Feedback on Possible Existing Buildings Reach Code.

Dear Mayor Rak and San Carlos City Councilmembers,

The Sierra Club Loma Prieta Chapter supports San Carlos’ efforts to decarbonize buildings. Building electrification reduces construction costs, improves indoor air quality, and is one of the most effective tools that municipal governments have to reduce emissions. Please consider the following recommendations regarding tonight’s building electrification study session.

1. **In new construction reach codes, remove blanket exemptions which can already fit into the already-existing technical infeasibility and extraordinary circumstances exemptions.** Every new piece of fossil fuel infrastructure will reverse San Carlos’ climate goals and should be avoided when possible. Gas appliances should be disallowed by default, with the technical infeasibility exemption and extraordinary circumstance exemption being able to cover rare cases where an applicant can make a legitimate argument for the use of gas. The following blanket exemptions should be removed from new development in the reach code: 1) residential cooking and fireplaces, 2) non-residential cooking and 3) space heating in laboratories. This would bring San Carlos’ reach code in line with the all-electric standards of many Bay Area cities such as Pacifica and San Mateo.

2. **Support and direct staff to begin working on the menu items recommended by the experts from Bay Area Reach Codes.** We hope that Council directs staff to work on the menu items listed in the staff report, and provides the support and resources needed for the completion of those items. Public education and equity protections will be an essential component of this process.

3. **The scope of menu item 1 (Heat pump installation instead of AC installation or replacement) can be expanded to include the replacement of gas furnaces with electric heat pumps.** Furnaces are a key component of building electrification and should be considered alongside the programs listed in the staff report menu.

Thank you for your consideration,

Gladwyn d’Souza
Conservation Committee Chair
Sierra Club Loma Prieta Chapter

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