



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

September 28th, 2021

City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050

Via email to mayorandcouncil@santaclaraca.gov

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Re: 9.28.2021 Agenda item 8: Action on the Introduction of an All-Electric Reach Code

Dear Mayor Gillmor and Santa Clara City Councilmembers,

The Sierra Club Loma Prieta Chapter strongly supports the all-electric reach code proposed for the September 28th City Council meeting. While the overall code is excellent, we believe there are a few small but important opportunities for the City Council to strengthen the Reach Code. If these modifications can be accepted without delaying the first reading, we hope the City Council moves to include these minor amendments. Precedent has been set by many jurisdictions, including Los Gatos, San Mateo County, and Mountain View, which all removed and modified exception language on the day of the first reading without delaying that first reading.

Exception 1

The existing language is "F, H, L Occupancies may utilize natural gas and provide installed rewiring for future use of electric appliances." We propose adding "To take advantage of this exception, applicant should provide third party verification that an All-Electric building is not cost effective and feasible."

Exception 3

The existing language is "Hotels with eighty or more guestrooms may utilize natural gas in on-site commercial laundry facilities only." We propose adding "To take advantage of this exception, applicant should provide third party verification that an all-electric commercial laundry facility is not cost effective and feasible."

Exception 4

We propose adding the following modifications in bold:

Non-residential kitchens may not **utilize gas for** cooking appliances unless the applicant establishes that there is not an all-electric option for the kitchen using commercially available technology. If the building official grants an exception, EnergySTAR rated **propane** appliances shall be used.

The default requirement for building types should be all-electric. Gas should be used only as a last resort in cases where technical infeasibility and a cost burden can be demonstrated by a third party to the Building Official. Such language would prevent the unnecessary expansion of the gas pipeline network which is a threat to the public health, finances, and climate of Santa Clara residents. The modified language could also send a stronger signal to the private marketplace, further accelerating the proliferation of all-electric technologies.

Adopting an All-Electric Reach Code is an important step towards reducing future gas use and limiting emissions that threaten the survival of ecosystems and organized human life on earth. Many more climate actions will need to be achieved by Santa Clara and other jurisdictions going forward. We look forward to supporting the City in fighting for the health and survival of its residents by rapidly reducing emissions.

Sincerely,



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Loma Prieta Chapter Sierra Club



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

Cc: James Eggers
Executive Director
Loma Prieta Chapter Sierra Club