



May 20, 2024

San Rafael City Council  
1400 Fifth Avenue  
San Rafael, CA 94901

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**RE: Green Building Code Amendments (5.a)**

Honorable Council Members,

We applaud the City's adoption of the enhanced standards for building renovations over 5,000 square feet proposed this evening. However, the rollback of building code prohibitions of gas in new and expanded buildings is a huge setback for the City's greenhouse gas emission reduction goals.

Gas furnaces, water heaters and other appliances, emit a quarter of GHG in San Rafael. Electrifying buildings with heat-pump replacement appliances significantly cuts these emissions and helps people prepare for the Bay Area Air Quality Management District bans on gas water heaters and furnaces coming in 2027 and 2029, and the State's 2030 ban, while also protecting homes from heat waves and smoke events.

We urge the following steps to get electrification back on track:

- Increase the GHG reduction target for renovations from 10-20% to a full 25%, matching the amount that the continued use of gas emits.
- Track the code's reduction of GHG each year to assure that reductions are being met, or how to improve them.
- Eliminate the 'catch-all' exemption of gas appliances from the amended code. That loophole is unwarranted.
- Work with the State and County to craft performance standards for new construction and expansions of gas lines that satisfy the legal fears driving their roll-back.
- In addition to the interest groups listed in the staff report, consult and increase efforts to implement General Plan 2040 policies on building electrification (C-4.1D).
- Continue work on a countywide comprehensive Building Electrification Plan for adoption this year.

In addition to GHG emissions, nitrogen oxide (NOx) pollution from burning gas in buildings is known to endanger human health by causing respiratory conditions such as asthma, increased likelihood of hospital visits, heart disease, and premature death. BAAQMD projects that replacing residential gas appliances in California with zero emission electric alternatives could prevent 354 early deaths, and 596 acute cases of bronchitis annually.

There is no reason to keep burning fossil fuels to heat our buildings and water when clean, efficient electric heat-pump

alternatives are now readily available, with ample economic incentives from federal, state, and local sources supporting their installation. These pollution reductions will deliver much-needed health and air quality benefits to Bay Area residents, notably to those low-income communities of color that have been most burdened by air pollution.

We urge your continued pursuit of zero-GHG buildings.

Sincerely,

William Carney  
Vice President