



July 22, 2024

Ventura County Board of Supervisors
Sent via email clerkoftheboard@ventura.org

Re: Agenda Item 112; Consider a fuel-neutral, high-efficiency building reach code

Dear Supervisors,

Climate First: Replacing Oil & Gas (CFROG) is a Ventura County-based advocacy organization leading a just transition away from fossil fuels to protect our community, economy, and climate. We are committed to the establishment of an economy and community that is sustainable, inclusive, and promotes renewable energy. We, on behalf of hundreds of volunteers and supporters in Ventura County, are writing to urge the Board of Supervisors to **consider a fuel-neutral, high-efficiency building requirement to replace the current all-electric building reach code.**

Buildings are one of the largest greenhouse gas emission sources in Ventura County; tied with solid waste at 17% and just ahead of stationary sources (oil and gas, etc.) at 16%.¹ To address this major source of pollution, Ventura County adopted an all-electric code for new building construction. Unfortunately, as a result of a fossil fuel-funded² lawsuit against a similar ordinance in Berkeley, we understand Ventura County's consideration of repealing the current ordinance. It is imperative it be quickly replaced with a strong building ordinance that incentivizes the use of electric building appliances and systems.

We encourage Ventura County to learn more about and consider implementing an energy performance requirement for mixed fuel and all-electric buildings which requires buildings to comply with greater performance levels regardless of building power source – electricity and natural gas OR electricity only. At least six cities and counties in California have replaced their all-electric building code by adopting this approach, including our Central Coast neighbors, San Luis Obispo.³ This “fuel neutral” ordinance provides builders and developers with more choice in how they would like to design buildings. Due to the high-efficiency nature of heat pumps and other electric systems, the policy offers *voluntary incentives* for all-electric buildings, which are cheaper to build. This is a “plug and play” policy that can be implemented quickly and with little resources from the County. There are a multitude of existing resources to support the County of Ventura in adopting this approach and requires no new processes at the building counter or from

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staff.⁴ See [“One energy performance requirement for mixed fuel and all-electric” resources – including application package, internal staff resources, and implementation – at this link.](#)

According to other similar jurisdictions, this is the “best and most timely opportunity” to continue pursuing adopted climate action goals within the existing legal framework.⁵

This approach can be implemented in tandem with additional incentives and fee discounts, but Ventura County must take advantage of the resources available to quickly implement the best policy to pursue our climate action goals and provide builders with choice.

- **Choice + Incentives:** This approach provides both (1) choice in design to the builder and (2) incentives to support building electrification. Increasing building energy performance requirements via local amendments to the California Energy Code (or a “reach code”) leaves the door open for builders to use natural gas, a mix of natural gas and electric, or all-electric plans.

The California Energy Code establishes whole-building efficiency requirements, which account for a building's water heater, HVAC (heating, ventilation, and air condition) system, solar generating system, and insulation, among other things. However, it does not account for cooking equipment, laundry dryers, or other unregulated energy uses. As such, this proposed reach code would also not regulate these appliances. As required by state law, this reach code is cost-effective and uses less energy than the standard requirements. A “fuel neutral, performance requirement-based” reach code simply increases the “Energy Design Rating” (EDR) score minimum for new construction.

Attached is a case study example illustrating the practical effect of the proposed reach code.

- **County Climate Goals:** To adequately address the life-threatening impacts of the climate crisis, Ventura County has committed to a goal of a 41% reduction in greenhouse gas emissions by 2030 (below 2015 levels). There is still a major gap between emission reduction targets and emission reductions from current Climate Action Plan programs.⁶ The County must prioritize proven mitigation measures, including building ordinances passed by other jurisdictions that prioritize electrification, like this one.

We celebrate Ventura County’s historic leadership in prioritizing building electrification – this is a major climate- and health-forward contribution to improving the daily lives and futures of residents, especially those living in environmental justice communities overburdened with dangerous gas infrastructure, like West Ventura. We urge you to **consider a fuel-neutral, high-efficiency building requirement.**

With urgency,
Haley Ehlers, Executive Director

1. County of Ventura, eClimate Action Plan. <https://stage-ecap.ventura.org/ghg-emissions>
2. KQED (April 27, 2023), SoCalGas helped bankroll law firm that challenged Berkeley natural gas ban. <https://www.kqed.org/news/11947150/socalgas-helped-bankroll-law-firms-fight-against-berkeley-natural-gas-ban>
3. City of San Luis Obispo (September 19, 2023), City Council Agenda Item 7.b. <https://pub-slocity.escribemeetings.com/Meeting.aspx?Id=ccbc151e-7c2d-40e3-944b-5522ac2953f5&Agenda=Agenda&lang=English&Item=22&Tab=attachments>
4. California Energy Codes & Standards, Reach Code Paths, “One energy performance requirement for mixed fuel and all-electric.” <https://localenergycodes.com/content/reach-codes/building-efficiency-renewables>
5. City of San Luis Obispo (September 19, 2023), City Council Agenda Item 7.b. <https://pub-slocity.escribemeetings.com/Meeting.aspx?Id=ccbc151e-7c2d-40e3-944b-5522ac2953f5&Agenda=Agenda&lang=English&Item=22&Tab=attachments>
6. County of Ventura, eClimate Action Plan. <https://stage-ecap.ventura.org/ghg-emissions>

Attachments:

- Excerpt from Staff Report “Introduction of an Ordinance Approving Local Amendments to the California Energy Code” 9/19/23 from City of San Luis Obispo.

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Practical Effect of the Reach Code

Because the City is working within the confines of the California Energy Code, the description of the proposed approach above is inherently technical. This section illustrates the practical effect of the proposed approach by providing a simplified example of how a single-family home designer would comply with the reach code.

A building designer working on a single-family home built to the code minimum would likely include high efficiency LED lighting, rooftop solar, an electric heat pump hot water heater, a natural gas furnace, insulated walls, an insulated attic, and efficient windows, among other things. The designer would load the building design into a computer model and estimate its energy performance. The energy modeling software would provide standard reporting metrics, including an EDR1 score. The designer would then compare the EDR1 score to a standard design building. In this case, the designed building's EDR1 score would be equal to the standard design building's EDR1 score and would comply with that part of the California Energy Code.

With the reach code in place, the designer would now need to achieve an EDR1 score that is 6 points better than the standard design building. If this building designer replaced the gas furnace with a commonly available heat pump HVAC system, the building would achieve a score that is 6 EDR1 points better than the code minimum and would be consistent with the proposed reach code requirements. Alternatively, the building designer could keep the gas furnace and install a battery storage system, which would also result in an increase of more than 6 EDR1 points. The building designer also has the option to develop a package of efficiency and solar measures; so long as the measures lead to an increase of 6 or more EDR1 points better than the code minimum, it is consistent with the reach code.

This example is similar for the other building types where the compliance margins could be achieved by either installing electric heat pump HVAC equipment or installing some package of additional solar capacity and efficiency measures.