

Jessica Lynch

From: Bruce Deterra <yolobruce@gmail.com>
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To: Planning Commission
Subject: Comments re draft Housing Element 2021 - 2029

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Proposed Program Actions under Goal 6: Energy Conservation are inadequate to address green house gas (GHG) emissions.

Action 6.1.11 should be revised to include an interim 2030 goal of reducing GHG emissions to 40% of 1990 levels and also revise the 2040 goal to reach neutrality by 2040, not be an either 80 percent or neutrality by 2040. Focus on neutrality. Having an interim goal will help ensure steady progress and the opportunity increase reduction efforts if we are falling behind in meeting the 2030 goal. Such an interim goal will also require action during the 2021 - 2029 period to meet the 2030 goal.

An additional Program Action is needed to specifically address a requirement to eliminate natural gas appliances (space and water heating, cooking and clothes dryer) in all new residential construction by 2025. Numerous cities in California, including neighboring Sacramento, are pursuing similar requirements. Allowing new dwelling units to continue being constructed with natural gas capacity will lock in additional GHG emissions for decades, making it impossible to meet needed GHG reductions without expensive retrofits to newly constructed dwellings and the junking of appliances before their useful life-cycle is complete. The technology to construct all-electric housing is readily available and affordable. It is counter-productive to continue increasing residential dependency on natural gas. The City should develop a clear path to eliminating the use of natural gas in all housing applications. Natural gas is a green house gas that is contributing to climate change.

Lastly, all new multi-dwelling housing projects should be required to provide electric vehicle charging facilities for residents. Such a requirement could be its own Program Action or be included within an already identified Action such as 6.1.7.

Thank you for your consideration of these comments.

Bruce de Terra
yolobruce@gmail.com
Davis, CA