



April 21st, 2025

Demian Hardman-Saldana and Adam Scarbrough
Contra Costa Dept. of Conservation and Development

Subject: Public Comment on Contra Costa County Clean Energy Roadmap for Existing Buildings.

Dear Demian and Adam,

We appreciate the opportunity to provide feedback on the Clean Energy Roadmap for Existing Buildings and commend the County for its leadership in advancing sustainability efforts. While the roadmap lays a strong foundation, we would like to offer suggestions to enhance its clarity, impact, and effectiveness in achieving building electrification goals.

Clarifying the Roadmap's Purpose

We suggest including a vision statement and clear goals in line with the Climate Action plan's directive in BE-2 to create a detailed pathway for converting existing buildings to carbon-free energy sources. Showing how this can be achieved against the timelines of 2030 and 2045 could help build momentum.

Strengthening Implementation Strategies (Section 10)

- The roadmap effectively outlines focus areas for building electrification, but additional detail on specific strategies, deliverables, and timelines would enhance clarity.
- Clearly defining the County's role versus that of other organizations would provide greater transparency.
- Would the County consider using a structured format, similar to the Climate Action Plan, to improve readability? A visual representation of how different strategies interconnect could also be valuable.

Accelerating Policy Implementation (Section 9)

The roadmap discusses potential policy options. Please consider prioritizing one or two of the report's proposed action items for review and relatively quick enactment.

Demonstrating quick wins would reinforce the County's commitment to a clean energy transition. Examples of policies that could be implemented:

- Home modernization at point of sale through an escrow account (see City of Berkeley's BESO program)
- Time of Major Renovation – Requires homeowners to replace gas appliances with the electric equivalent when performing major home renovations.

Incorporating Existing State and Local Policies

- The roadmap does not currently mention key policies that could support its efforts, such as Governor Newsom's 2022 directive to the CPUC setting ambitious electrification targets.
- Additionally, would the County consider highlighting existing local programs—such as Richmond's zonal electrification project, the East Contra Costa Healthy Homes Collaborative, and community electrification fairs—as potential models for implementation?

Expanding Funding and Financing Options (Section 6.0)

- The roadmap presents valuable financing ideas but could be strengthened by including additional funding sources, such as the Equitable Building Decarbonization Program, SB 1212's 2024 zonal decarbonization pilot, and the New Climate Fund. Has the County explored these opportunities for funding?

Tailoring Strategies for Market-Based vs. Equity-Based Approaches

- The roadmap could better differentiate strategies for market-driven electrification versus equity-focused efforts. Would the County consider addressing these distinctions more explicitly, and show how the county role may differ with these different approaches.
- Specifically, for Community Engagement: Will the engagement approach be applied uniformly across all unincorporated communities, or will strategies vary based on income level and impact status?
- Can the plan specify how the County will tailor engagement for households that may need additional support beyond market-based incentives?

Technical Clarifications and Policy Considerations

- Page 36 states that over half of single-family homes require panel upgrades. What data supports this estimate? Does it refer to homes with electrical service below 100 amps? There is ample evidence that homes under 3200 square feet can be electrified on 100 amps.

- Page 40, Section 9.0, does not currently mention education and norm-shifting. We are still behind in community understanding of the need for, and benefits of, electrifying appliances. The County, as a trusted messenger, is important to this education task. Toward that end, consider including strategies to increase public awareness and encourage cultural shifts toward electrification.
- Refining Terminology on Energy Sources - The term "low-carbon fuels" appears in several places (Page 9, Paragraphs 2 and 3, and first bullet on Page 41). Since this phrase is often associated with natural gas, which is low in carbon but high in methane emissions, please replace 'low carbon' with a term such as "zero-GHG emission energy sources".
- Page 43 Other Actions: Should an action be added to evaluate the need for, and encourage the addition of, EV charging infrastructure at existing multi-family communities. The availability of EV charging capability is an important aspect of "building" electrification.

Expediting Implementation and Leveraging Expertise

- Early-stage electrification projects could proceed in parallel with roadmap finalization. Specify any projects that are in discussion.
- Specify where consultants with specific knowledge are required or could be considered. This will help identify clear areas with a need for funding.

Corrections and Technical Edits

- Page 12: "Many gas appliances still require electricity to power fans and function." Suggested correction: "Most gas appliances require electricity in order to operate."
- Page 13: The description of Building Energy Efficiency Standards needs revision. The current (2022) code prescribes heat pump space conditioning in Climate Zone 3 (West Contra Costa County) and allows gas or heat pump space conditioning in Climate Zone 12 (East Contra Costa County). Heat pump water heating is required in Climate Zone 12.

In closing, we appreciate the County's leadership in shaping this roadmap and encourage refinements to ensure the plan is actionable, equitable, and effective. We look forward to seeing a revised version that integrates these considerations and strengthens the County's commitment to a clean energy future.

Thank you for your time and consideration.

Lisa Jackson, Denice Dennis, Marti Roach and Gary Farber - 350 Contra Costa Action