



September 10, 2022

Mayor and City Council Members  
City of Glendale  
613 E. Broadway,  
Glendale, CA 91206

**RE: Glendale Reach Codes, City Council September 13, 2022**

Dear Mayor Kassakhian and Councilmembers Asatryan, Brotman, Devine, and Najarian,

As Glendale residents and local organizations committed to improving public health and confronting the climate crisis, we commend the City for its decision to develop building electrification, solar PV, and EV charging reach codes for new construction.

We believe the recommendations in the staff report represent an overall very strong set of policies. We agree with the Sustainability Commission's recommendations, which strengthen the reach codes in important ways. As top priorities, we recommend the following:

1. Substantial renovations to existing buildings should be included in the reach codes. If it is impractical to include them in the current reach codes to go into effect on January 1, 2023, then the City should work to amend the ordinances during 2023 to include substantial renovations. The Sustainability Commission recommended that this work be done in time to take effect at the beginning of 2024.
2. The EV charging reach code should include additional EV-charging requirements for multifamily homes so that every dwelling unit has a dedicated space equipped with

electric-capable infrastructure or better. The Sustainability Commission recommended 100% of spaces be at least EV capable. The Commission also recommended treating hotels and motels like non-residential buildings rather than multifamily buildings, and recommended that for non-residential buildings, Glendale establish standards double those required by CalGreen Tier 2.

## Building Electrification

More than 50 cities across California have recognized all-electric new construction as a cost effective and socially equitable way to reduce greenhouse gas emissions, protect public health, and lower construction costs.

We approve of the approach taken in the proposed reach code, to require electrification for all building types and uses, with an infeasibility waiver that extends only to the uses where electric appliances are not available and that requires the building to be electric-ready to reduce the cost of future upgrades. We agree with the Sustainability Commission that waivers should be for physical infeasibility. We urge the City to adopt a reach code that maintains this approach.

To maximize the public benefit of the reach code, **we strongly recommend that the City include both new buildings and substantial remodels to existing buildings.** The most cost-effective time to install electric appliances is during initial construction or during a major remodel.

Definitions of substantial remodel vary, and can be based on cost or physical area. A successful approach would be to define it as improvements greater than or equal to 50% removal or replacement of the linear length of the walls of the building (exterior plus interior) and 50 percent of the roof area.<sup>1</sup> If Glendale already has a definition of substantial improvements for which new code and standard compliance is triggered, that may be a useful definition to use.

As the annual volume of entirely new stand-alone construction is fairly low, the positive impact of the reach code should be increased by including major renovations. As noted above, incorporating substantial renovations can be done separately in 2023 if doing so now would delay approval of the reach code for new construction. This step should not wait 3 years until the 2025 Building Code cycle. It should go into effect in January 2024 or sooner.

## On-Site Solar PV Electricity Generation

Rooftop solar is cost-effective for the building owner and reduces the impact to the grid of increased electrification of buildings and transportation, lessening our reliance on fossil fuels. We strongly support the proposal to require additional solar PV on non-residential and multifamily buildings, with waivers on a showing of technical infeasibility.

Design standards should encourage the effective use of solar catchment integration into parking lots. Parking lots should be designed to accommodate solar shade canopies and use reflective

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<sup>1</sup> See the Statewide Codes and Standards team's review of substantial improvements definitions, [https://localenergycodes.com/download/1155/file\\_path/fieldList/Review%20of%20Substantial%20Improvement%20Definitions-2022-06-08.pdf](https://localenergycodes.com/download/1155/file_path/fieldList/Review%20of%20Substantial%20Improvement%20Definitions-2022-06-08.pdf).

coatings. Such standards provide for a natural heat island cooling effect needed to offset climate heating.

The solar PV reach code should be extended to substantial remodels in 2023.

## **EV Charging**

Transportation is the number one source of greenhouse gas emissions in Glendale and the state as a whole. The solution is a mix of safe and accessible public transportation, bicycle and pedestrian-friendly streets, and the replacement of vehicles powered by internal combustion engines with electric vehicles. Fortunately, the transition to electric vehicles is gaining momentum.

The state has established 2035 as the year by which gas-powered cars will no longer be available to purchase in California. This transition will lead to increased electric power consumption, for which Glendale Water & Power should already be in the preliminary planning stages, to respond to this future need. This is true with or without the proposed reach code, which will have only a small incremental impact on EV adoption in Glendale.

While the reach code will not have a substantial impact on the power grid, it will save building owners money over time and will allow for more equitable growth for electric vehicle use and access. When approved, this proposed reach code will help building owners avoid future costly retrofits for electrical infrastructure by providing adequate electrical charging capacity up front. As the staff report notes, “According to the California Air Resources Board (CARB), installing EV charging infrastructure in a new building can save an estimated \$7,000 to \$8,000 per parking space compared with retrofitting it later (CARB 2019).”

We strongly support the proposal to require some form of EV-installed, EV-ready, and EV-capable parking spots with all building types that have parking spaces. Requiring Level 2 EV chargers, or at least EV-capable parking spots, in multifamily and non-residential buildings will make electric vehicles more accessible to lower-income residents. We would like to ensure that all residents in new apartment buildings have access to EV charging, so we urge the City to require at least one EV-capable parking spot for every dwelling unit by supplementing the current proposal for multifamily buildings with additional EV-capable parking requirements. We also support the Sustainability Commission’s other recommendations for strengthening the EV charging reach code.

We believe that strategies such as GWP’s new off-peak charging incentives can lessen peak loads from EV charging.

The EV charging PV reach code should be extended to substantial remodels in 2023.

## **Summary of Recommendations**

We recommend that City Council pass a motion based on the motion provided in the agenda packet, with the following modifications:

- Elements (1) and (2) of the motion should clarify that applicants may seek a waiver based on *physical* infeasibility, as specified in the staff report (see pp. 10-11) and recommended by the Sustainability Commission;

- Element (3), related to EV charging, should be amended to “adoption of *standards double those required by the CalGreen Tier 2 Standards for Electric Vehicle Charging, with the additional requirement that for new multifamily residential properties, there will be at least one EV-capable parking spot for each dwelling unit.*”
- The motion should direct staff to immediately begin work to incorporate substantial renovations into the reach codes, including presenting options for how to define substantial renovations. This work should be completed in time for substantial renovations to be included in amended reach codes by the beginning of 2024 or sooner.

We are attaching a fact sheet about the benefits of these reach codes, prepared by the Glendale Building Electrification Working Group, which is a joint initiative of the Climate Reality Project, Los Angeles Chapter and the Glendale Environmental Coalition.

Sincerely,

Xochitl Ruiz  
Michael Rochmes  
**Climate Reality Project, Los Angeles Chapter**

Kate Unger  
Donielle Lemone  
Elise Kalfayan  
Jack Walworth  
Joanna Pringle  
Jane Potelle  
Monica Campagna  
**Glendale Environmental Coalition**

Ben Stapleton  
**US Green Building Council—Los Angeles Chapter**

Kim Orbe  
**Sierra Club Angeles Chapter**

David Eisenberg  
**Sierra Club Verdugo Hills Group**

Winston Thorne  
**American Institute of Architects Pasadena & Foothill Chapter**