

From: Michael Colvin <mcolvin@edf.org>
Sent: Tuesday, February 23, 2021 4:26 PM
To: Comments
Subject: CAAP
Attachments: Agoura Hills Climate Action and Adaptation Plan.pdf

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Hello

Attached, please see a letter on your forthcoming considerations of the CAAP.
Let me know if you have any questions or concerns,
Michael



Michael Colvin
Director Regulatory and Legislative Affairs, California Energy Program

Environmental Defense Fund
123 Mission St.
San Francisco, CA 94105
T 415 293 6122
C 415 710 1224
mcolvin@edf.org
edf.org

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February 23, 2021

City Council
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 91301

Re: Agoura Hills Climate Action and Adaptation Plan

Dear Mayor Weber and City Council Members:

Environmental Defense Fund (EDF) is one of the world’s largest environmental organizations, with more than 60,000 members in California, including members in the City of Agoura Hills. It has come to EDF’s attention that Agoura Hills’ City Council Members received a letter from Southern California Gas Company (SoCalGas) on February 9, 2021, that made reference to EDF. This letter serves to clarify EDF’s position.

EDF applauds Agoura Hills’ proactivity in addressing climate change through its Climate Action and Adaptation Plan (CAAP). Key to achieving meaningful greenhouse gas reductions (GHGs) means tackling the issue from many fronts: energy efficiency, transportation electrification, building decarbonization and fuel switching, and, where other measures are not available, use of renewable natural gas - more accurately referred to as biomethane. **Biomethane is both scarce and expensive for customers compared with electrification. Therefore, we should limit its usage to when most appropriate.**

In 2019, SoCalGas submitted an Application to the California Public Utilities Commission (CPUC) to offer a biomethane tariff. EDF, along with various other parties, entered into settlement discussions with SoCalGas in order to pursue improvements to the proposed tariff, including: targeting the biomethane tariff to customers who have already undertaken energy efficiency measures; implementing certain reporting disclosures; and providing access for low-income customers. The CPUC approved this modified tariff in December 2020 and it will be available to customers in 2021. To clarify, EDF did not jointly request this biomethane tariff.

EDF has consistently indicated that alternative fuels should be reserved for hard-to-electrify uses, such as heavy-duty industry. To the extent biomethane plays a role in Agoura Hills’ CAAP, it should only be to prioritize hard-to-electrify customers as electrification is both more affordable and more impactful from a GHG reduction standpoint.

For the purposes of the CAAP, EDF encourages Agoura Hills to explore electrification as a least-cost “no regrets” strategy first. The city may want to engage with local community partners to

find ways to get landlords and tenants to help electrify uses and overcome initial cost barriers to “going green.” After those strategies are exhausted, there may be a limited role for biomethane as a transition fuel.

We applaud Agoura Hills for its thoughtful approach in the CAAP and look forward to championing its work in future

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Colvin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael Colvin
Director Regulatory and Legislative Affairs,
California Energy Program
Environmental Defense Fund

From: jon walter mocey-hanton [REDACTED]
Sent: Wednesday, February 24, 2021 8:13 AM
To: Comments
Subject: caap - item # 9 lets go gas-free!!

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dear city council members

i just wanted to express my strong support for aggressively moving our city forward towards a greener more environmentally friendly future

i strongly support councilmember lopez's comments from the previous city council meeting where she expressed that she is in favor of banning all gas hook ups from being included in any and all new developments in our city this would be a wonderfully progressive forward thinking and noble choice for our future if you are not able to approve that important stipulation than eliminating gas hook ups from new residential developments would be the next best thing

please take this important step towards a greener healthier choice for the future of our city

join with the over forty other cities and counties in california who have done the same

all-electric homes can use heat pumps that can be up to 300% more efficient than gas heaters while being powered by renewable electricity instead of fossil fuels

this will lower construction costs for developers and increase access to affordable housing

this will result in reduced monthly utility bills for residents and businesses

this will improve indoor air quality and mitigate harmful health impacts like asthma

these are changes on a large scale and large scale changes are what we need to do immediately to help preserve our city and the world for future generations to enjoy as we have!!

please do the right thing
thank you very much

from
jon walter mocey-hanton
liberty canyon resident

From: Brad Rosenheim <brad@raa-inc.com>
Sent: Wednesday, February 24, 2021 8:58 AM
To: Comments
Cc: Denis Weber; Nathan Hamburger; Ramiro Adeva; Deborah Klein Lopez; Chris Anstead; Illece Buckley Weber; Linda Northrup
Subject: Feb. 24, Council Agenda Item #6 - Proposed CAAP
Attachments: DCAAP Letter.PDF

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Please see attached, my letter pertaining to Council Item No. 6 on tonight's council agenda.

Thank you for the opportunity to provide my thoughts related to this important matter.

Be well and stay safe,

Brad

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Brad M. Rosenheim
Rosenheim & Associates, Inc.
21600 Oxnard Street, Suite #630
Woodland Hills, CA 91367
brad@raa-inc.com
P: 818-716-2780
F: 818-593-6184

Brad M. Rosenheim

February 23, 2021

The Honorable Denis Weber, Mayor
and Honorable City Council Members
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 91301

Re: Draft Climate Action and Adaption Plan (DCAAP)
Item No. 6, February 24, 2021 City Council Agenda

Dear Mayor Weber and Councilmembers,

I am writing as a long-time resident of the City of Agoura Hills who is concerned with the short and long term impacts of Green House Gases (GHG) on the climate and resiliency while also being aware of the potential for unintended consequences associated with public policy objectives. It is in this vein that I provide the following comments related to the DCAAP:

Section 1.0, Introduction of the plan states;

By using energy more efficiently, harnessing renewable energy to power buildings, recycling waste, and enhancing access to sustainable transportation modes, the City will keep dollars in the local economy, create jobs, and improve the community's quality of life.

This is an important statement however, there is no information in the DCAAP providing substantiation of this claim. If the CAAP is intended to provide such benefits to the city, they should be clearly identified and quantified.

Section 3.2.1.1, Measure 1.2 recommends for council action, a residential Energy Conservation and Disclosure Ordinance. I don't know what this might constitute but an ordinance that would mandate residents to disclose their energy utilization to the city seems inappropriate, cumbersome and difficult for individual homeowners to navigate. Measure 3.3 includes a similar measure for small non-residential buildings which seems equally as challenging for small business owners. Also, in regard to single family homes, I strongly urge against the city adopting single-family home retrofit mandates when a homeowner chooses to renovate or improve their residence.

There are a number of standards and goals included for new residential and commercial uses to reduce GHG emissions and adapt to climate change. The DCAAP presents lists of strategies, implying that all said strategies must be implemented by each project to achieve the stated goal. If my understanding is correct, the lack of flexibility for each project to identify the most effective set of strategies that may apply to the unique circumstances of said project, will ultimately limit the effectiveness of the CAAP. I urge the council to adopt a flexible approach for project compliance.

Section 3.2.1.2, Measure 2.1 requires all new residential developments proposing two (2) or more dwelling units to achieve 100 percent electrification. There are several questions that occur to me related this requirement such as, what does 100 percent electrification mean/constitute? Also, what if

the infrastructure does not exist in the city to support complete electrification (whatever that might mean) of every new residential building? Finally, what are the cost implications of the new requirements on housing prices. It would seem prudent for the city to work with industry experts to understand the costs associated with electrification and reducing GHG and then determine which are the most cost effective in achieving the overall objectives.

I strongly support the planting of new trees throughout the city as a means of reducing the heat island effect as well as a means of carbon sequestration. This effort should be expanded beyond parking lots, to city owned properties, parks and other non-city owned open spaces upon which the ownership agrees to accommodate the planting of trees. I also strongly recommend that the city simplify and expedite the process for planting new trees in parking lots through a non-discretionary, administrative permit.

Section 3.3 discusses increasing Water Efficiency. This is an extremely important topic and one that I strongly support. I do however want to raise one point that seems beyond the city's control but will nevertheless affect all residents and businesses in the city. The cost to provide water to customers remains constant even while demand decreases. As the city rightfully seeks to reduce water use, it must also work with the Las Virgenes Municipal Water District to control the costs to its customers.

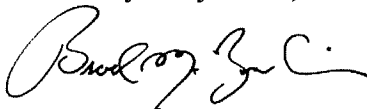
I am concerned with the implications of the conversion from natural gas to 100 percent electricity. Natural gas use is a modest contributor to GHG in the city, while being an important asset to homeowners and businesses. I think the council should act prudently in their approach to this issue recognizing the importance of natural gas while planning for the conversion to RNG and other clean fuel sources over time.

As identified in the DCAAP, on road transportation is the greatest source of GHG in the city. A very effective and impactful way for the city to address this single source is promoting, and if possible, incentivizing, people to work from home rather than travel out of the city to jobs elsewhere. The city should consider how it can best facilitate, work from home practices, as a means of effectively reducing VMT. This should be included in the CAAP.

Many of the proposed DCAAP requirements are beyond the control of a project applicant yet, they seemingly must be met in order for a project to proceed. I strongly urge the council to evaluate the possibility of this and provide relief in the CAAP for such circumstances.

In closing, I want to thank the council for the opportunity to comment on this important plan. While I believe GHG reduction is a matter best addressed on a more universal basis (state, federally and internationally), I appreciate its essential nature and the desire of the city to contribute to its resolution. I only ask that it be done thoughtfully and in consideration of the overall quality of life in the City of Agoura Hills.

Very Truly Yours,



Brad M. Rosenheim