

## **Shirlee Herrington**

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**From:** Terry Holliman <terryholliman@gmail.com>  
**Sent:** Thursday, February 21, 2019 8:02 AM  
**To:** Placer County Environmental Coordination Services  
**Subject:** SAP/PRSP DEIR

**February 20, 2019**

**Placer County Community Development Resource Agency,  
Environmental Coordination Service  
3091 County Center Drive #190  
Auburn, CA 95603  
Attn: Shirlee Herrington, Environmental Coordinator  
([cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov))**

**Dear Ms. Herrington**

I have reviewed the County's Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan and the Placer Ranch Specific Plan and have the following questions, comments and concerns that I respectfully request be addressed by the County:

My comments are focused on Section 4.16 of the DEIR, specifically 4.16.3 Regulatory Setting. It begins by listing some of the applicable State rules and regulations, including the following discussion of Title 24, Part 6.:

"California's Building Energy Efficiency Standards CCR, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-Residential Buildings. Title 24 Part 6 was established by CEC in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy-efficiency standards for residential and nonresidential buildings. . . . In 2016, CEC updated Title 24 standards again, effective January 1, 2017. CEC estimates that the 2016 standards are 28 percent more efficient than 2013 standards for residential construction (CEC n.d.) and are approximately 5 percent more efficient for nonresidential construction (CEC 2015). The 2019 Title 24 Part 6 Building Energy Efficiency Standards were adopted by the CEC on May 9, 2018 and will take effect on January 1, 2020. The standards are designed to move the State closer to its zero net energy goals for new residential development. It does so by requiring all new residences to install enough renewable energy to offset all the site electricity needs of each residential unit (CCR, Title 24, Part 6, Section 150.1(c)14). CEC estimates that the combination of mandatory on-site renewable energy and prescriptively required energy efficiency features will result in new residential construction that uses 53 percent less energy than the 2016 standards. Nonresidential buildings are anticipated to reduce energy consumption by 30 percent compared to the 2016 standards primarily through prescriptive requirements for high-efficacy lighting (CEC 2018). The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary in response to local

climatologic, geologic, or topographic conditions, provided that these standards are demonstrated to be cost effective and exceed the energy performance required by Title 24 Part 6.”

This section continues with:

“Housing Energy Conservation GOAL: To increase the efficiency of energy use in new and existing homes with a concurrent reduction in housing costs for Placer County residents.

- Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency Retrofitting of existing units shall be encouraged.”

I would like to comment that the above underlined portion of Policy G-1 could be read to refer to the 2016 standard of Title 24, Part 6 since the 2019 version will not go into effect until January 1, 2020. This would subvert the gains in efficiency that new regulations require. Perhaps the sentence could be revised to state: “: The County shall require that all new buildings meet 2019 or later Title 24, Part 6 requirements for energy efficiency and encourage developers to exceed Title 24 requirements. It should be pointed out that it is unlikely that any building permit will be issued until the 2019 standard is in force.

In 4.16.4 Analysis, Impacts, and Mitigation the DEIR Building Energy Efficiency states:  
“STANDARDS OF SIGNIFICANCE Based on Appendix F (energy) of the State CEQA Guidelines, implementing the project would have a potentially significant impact on energy if it would:

- result in wasteful, ...;

- fail to incorporate feasible renewable energy or energy efficiency measures into building design, equipment uses, transportation, or other project features, or otherwise fail to increase reliance on renewable energy sources;”

By clearly requiring 2019 Title 24, Part 6 the County will minimize any controversy and improve the overall energy use by the project. This would be a very large mitigation in the modeling of energy usage and a positive for the DEIR.

Similarly, in the “PROPOSED SUNSET AREA PLAN GOALS, OBJECTIVES, AND POLICIES the SAP includes the following goals and policies related to energy consumption:”

“Housing Energy Conservation GOAL: To increase the efficiency of energy use in new and existing homes with a concurrent reduction in housing costs for Placer County residents.

- Policy G-1: The County shall require that all new dwelling units meet current State requirements for energy efficiency and encourage developers to exceed Title 24 requirements. Retrofitting of existing units shall be encouraged.”

This sentence should be revised as per the above discussion. In addition, the Policy G-1 should be continued to include a statement defining how the County will hire, and/or train, enough qualified and certified professional staff to evaluate the energy analysis, plans and documentations that are required by 2019 Title 24, Part 6. I do not believe that statements which include phrases like “the required actions (mitigations) will be implemented in the future” are acceptable as mitigation. Since the required implementation date is approximately ten months away the specific details should be available for inclusion.

Policy NR-6.7: Residential Energy Efficiency and section “IMPACTS AND MITIGATION MEASURES” should also be clarified to bring this section into agreement with 2019 Title 24, Part 6.

I would also like to echo the commentary of Pierre Delforge with the Natural Resources Defense Council in his blog of 12/5/18:

How would you like living in a home with a dramatically reduced electric bill? That will be a reality for most new homes in California starting in 2020, thanks to a new building energy code adopted today by the California Energy Commission. The updated code—the first of its kind in the nation—will combine rooftop solar panels with enough energy efficiency measures like insulation and better windows that all new single-family homes and low-rise apartments will use net-zero electricity. This means that their solar array should offset all electricity use for cooling, plug-in equipment, and lighting on an annual basis.

The groundbreaking decision to make these new homes net-zero electricity, coupled with major savings from more efficient lighting required by the updated code for commercial buildings, will save Californians more than \$1.7 billion in net energy savings over the next 30 years and reduce carbon pollution statewide by 1.4 million metric tons. This is equivalent to the emissions from the annual electricity use of all households in the city of San Francisco.

In addition to my comments, I would request that you also recirculate the DEIR to allow full and thorough analysis of the Alliance for Environmental Leadership’s Citizen Initiated Smart Growth Plan. This Plan is environmentally superior to the proposed project and meets County objectives as set forth in the DEIR. Thank you for the opportunity to provide comments on the DEIR. I look forward to a thorough response from the County.

Sincerely,

Terence Holliman  
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