

ENVIRONMENTAL POLICY COMMISSION
ECO-CITY HOMES RECOGNITION PROGRAM
COMMENTS ON DRAFT #4 BY EPC COMMISSIONERS

OVERVIEW

At the May 2024 EPC meeting members of the Eco-City Homes Recognition Program subcommittee presented the latest draft (Draft #4) of the subcommittee's proposed program to the EPC. After some discussion the subcommittee proposed that all members of the EPC use Draft #4 to evaluate their personal residences and to provide comments / recommendations to the subcommittee by Monday, June 3, 2024. Five (5) EPC Commissioners responded. Shown below is a summary of all the comments submitted.

COMMENTS

1. Bronze #1: Energy Star Portfolio Manager is quite confusing. It doesn't seem to be set up to support private residences/residential properties that aren't multi-units. To keep this on the list, I think we'll need some sort of explainer tool/document to instruct residents how to complete this.
2. Bronze #1: this should also provide for a low EUI not just an Energy Star rating. You also might include an EUI that starts high in bronze and then goes lower in Silver and lower still in Gold.
3. Bronze #3: Need to provide guidance as to what the recommended thermostat set points should be. (NOTE: There were two (2) very similar comments on this item.)
4. Bronze #4: Does having just one (1) Energy Star appliance qualify? Guidance needed.
5. Bronze #9: Change to a pledge to convert to LED lighting as bulbs are replaced.
6. Bronze #17 (originally shown as Silver #17 in the Commissioner's comments): I'm not sure this should be included since many indoor plants are poisonous to cats and dogs and thus you might be encouraging folks to unknowingly poison their pets if they aren't aware of the problem. (NOTE: A second Commissioner also commented on plant-eating pets, but did not recommend that the item be removed.)
7. Silver #6: Add a description of what this entails.
8. Silver #7: Move this to the Bronze category. External/public displays of eco-friendly behaviors and actions are great for fostering conversations. I planted native, pollinator-friendly plants in front of my house last summer and neighbors/passersby stop by often to ask me about the plants for their future purchases, even without an eco-friendly home placard or designation.
9. Gold / General #1: I'm having a lot of problems with many of the items under the Gold category because they seem to really favor the wealthy single family home owners and automatically exclude everyone else including condo owners. I don't know any Condo owners who have total control over nearly every category under Gold including converting their housing units to all electric - much of this must be done thru their Association. This also may be true for extra electrical capacity (wiring upgrades) for an induction stove, heat pump hot water heater, dryer and HVAC heat pump. Thus you are basically excluding them from the Gold category. This is especially true for solar panels, geothermal, backup battery, EV charger onsite, and perhaps high performance windows. You've also excluded them with outside categories such as the last 2. I think much of this also applies to low and middle income folks defined by me as the IRA does as

AMI of 80% for low and between 80-150% for middle income. The Gold category just seems to be not very equitable which was supposed to be the main driver for this program. I don't see how it accomplishes that goal. I would love to see the Gold category run by 10-20 low and middle income folks - who are passionate about fighting the climate crisis - to see if any of them would have the income and spend it to qualify and achieve 75% of the items listed under category Gold. I just can't see it. Those above AMI 150% yes.

10. Gold / General #2: Transportation Gold – EV ready infrastructure compared to Not Own a Car.*
11. General #1: While I recognize you have indicated you are only requiring 75% to achieve the category I wonder if it shouldn't be at least possible vs. not at all possible for folks to be able to achieve each of the items. If not, then at the very least everyone must be able to achieve at least 75% of the items and I don't believe that is true for either the Gold or Silver categories...
12. General #2: I have real concerns about using only specific benchmarking certifications since it's likely the City under the amended GBP will be going with EUI instead. Since there is a easy-to-use EUI Calculator (see this link here: <https://www.entecheng.com/calculators/eui.aspx>) and using it probably doesn't require any more effort than Certifications or inputting information into Energy Star Portfolio Manager - (it took me about 10 minutes to find my yearly total electric and gas usage and the square footage for my house) at the very least I think having an EUI under 25 or something like that should be added to, if not replace, the other criteria in the Gold Category.
13. General #3: Requiring someone to own either an EV (*Gold #13*) or no car (*Silver #4*) appears to me to discriminate against a) seniors, (who may not live where public transit is easily accessible or be able to install a charger where they live), b) the disabled (who may not be physically able to walk or get to public transit - so they must own a car, but can't afford or charge an EV), c) low income and perhaps d) middle income folks and e) all homeowners or condo owners who don't have a driveway or place to install an EV charger.
14. General #4: Generally I think less is more and thus perhaps the focus should be on items that move the needle and have the biggest impact on emission reductions vs. listing every item that might be possible.
15. General #5: What about pledges to convert to electric every fossil gas item you currently own when it breaks or needs to be replaced? This is what David Wallace Wells suggested back in 2019 when he published "The Uninhabitable Earth".

Miscellaneous Comments

1. If you change things to include a low EUI vs. only ESPM - I would qualify as only Silver according to your current listing, but not qualify at all under any category is you are requiring ESPM benchmarking even though I have an EUI of 15.83 (this includes both gas and electric and solar) when the ASHRAE guidelines lists an EUI of 23 as the goal for multi-family housing units and they are easier to achieve a low EUI since they are only exposed to the outside via 1 or 2 sides vs. 6 on a single family home like mine. I scored 16 out of 17 for Bronze - missing the required first item, 8 out of 11 in Silver and 6 out of 16 in Gold. If our overall goal is 50% reduction in GHG emissions by 2030, I think an EUI of 15.83 goes pretty darn far. I'd love to know everyone else's EUI.
2. I scored a 13 under Bronze (and would've been a 14 if my cat weren't obsessed with eating indoor plants).

3. One (1) Commissioner scored in the Bronze category; another missed Bronze by one item (had 75% but did not meet the requirement for benchmarking with Energy Star Portfolio Manager).
4. Business takes care of the structure, but BEHAVIOR! (Yes, in Renter section especially)*
5. Equity consideration? *
 - a. Bronze category doesn't cost too much
 - b. Silver and Gold are more pricey...
 - c. Maybe cars are business-related? Some low income folks need a car for their job.
6. Should we rename Bronze as Eco-City Recognition (cut the word Bronze?)*
7. Cost question – what is the pricing that it would cost to get a base level home up to qualify? *
 - a. Make it also include incentives
8. Old Town makes it hard – lots of stuff wouldn't work there*
 - a. OCA will take this and ask other Eco-City departments to see what should be added.
9. Tricky with 1 car in a 2-person household*
 - a. It should be more about “how many miles to do you drive in a year”
10. The car ones are tricky*
 - a. Gold is only EV-focused ... > we need to communicate that nuance that we prefer No Car

*Comment from the May 2024 EPC meeting.