

From: [Robin Ganahl](#)
To: [Public Testimony](#)
Subject: Ordinance 240434: Opposition & clarifying information from KC Climate Protection Steering Committee
Date: Friday, June 7, 2024 8:57:17 AM
Attachments: [KC Climate Plan Emission Reduction Strategies.pdf](#)
[Equivalent HERS Scores for IECC codes.pdf](#)

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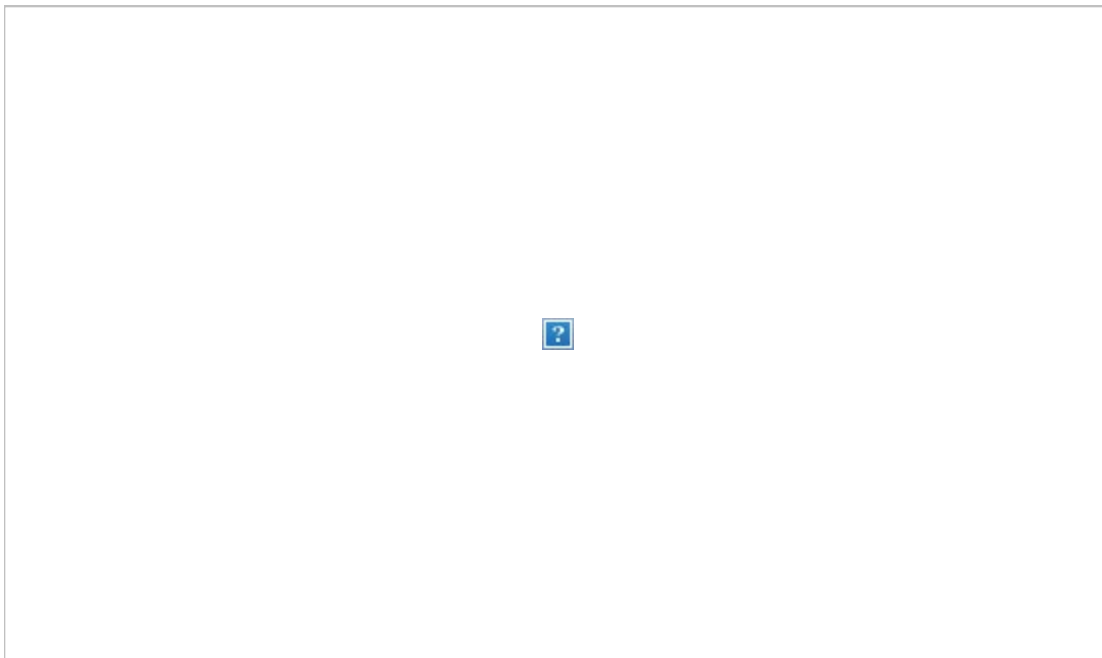
Dear Mayor Lucas and Members of City Council,

Thank you for the opportunity to provide further comments on Ordinance 240434. The Climate Protection Steering Committee (CPSC) would like to offer clarification about what the [2022 Climate Protection and Resiliency Plan](#) specifies related to energy efficiency and address comments made during the previous hearing. **We encourage the Council to continue to prioritize efficiency in new construction by requiring a HERS score that closely aligns with the Climate Plan's recommendation of 50 starting in 2022.**

Energy efficiency is a key strategy in the City's Climate Plan because:

- Energy use in homes and buildings account for **64%** of communitywide emissions.
- It lowers energy costs for households for the life of the home, directly addressing the severe injustice issue of proportionately very high utility bill burdens in communities of color.
- It can speed the transition to clean energy by reducing the amount of renewables that need to be built.
- It provides resiliency by keeping indoor temperatures more comfortable during extreme temperatures, especially important in areas prone to heat island effects.

The Climate Plan indicates that if we start in 2022 building new homes with a HERS score of 50 and commercial buildings with an average Energy Use Intensity (EUI) of 61.4 kBtu/sqft (the commercial equivalent of the HERS score in residential buildings), by the year 2040 overall emissions will be 2 percent lower than they would have been under a business as usual scenario. It also calls for adopting the most recent IECC building performance standards every three years starting in 2022. **Weakening the code and allowing HERS score of 68 does not align with the Climate Plan.**



p.69 Kansas City Climate Protection & Resiliency Plan, Strategy B-3: Ensure climate-ready, efficient construction

For more information about the impact of efficiency on the City's climate targets for 2025, 2030 and 2040, and equivalent HERS scores for IECC code years, please see the two documents attached to this email.

The Climate Protection Steering Committee opposes allowing a HERS score of 68. We urge Council to allow more time for all parties to adjust to the existing codes and empower the Planning Department to reduce permitting delays.

Sincerely,
Robin Ganahl
Chair, Kansas City Climate Protection Steering Committee
703-593-3028 cell

Summary of Strategies in 2022 Kansas City Climate Protection & Resiliency Plan

Note: Building Efficiency Codes are included in strategy B-3

Strategy Name	Target Emissions Reductions from Business as Usual Forecast in Metric Tons of Carbon Dioxide (MTCO ₂ e)					
	2025		2030		2040	
B-1: Increase building efficiency and health for commercial and public buildings	411,500	5%	770,000	9%	1,506,700	16%
B-2: Improve the efficiency, affordability, and durability of homes	256,800	3%	479,900	5%	951,200	10%
B-3: Ensure climate-ready, efficient construction	77,700	1%	96,200	1%	183,600	2%
B-4: Transition building systems to use clean, reliable electricity	100,000	1%	441,900	5%	611,000	6%
E-1: Increase the percentage of renewable energy in the utility grid mix	674,300	8%	1,230,800	14%	2,489,300	25%
E-2: Expand neighborhood and commercial renewable energy generation	44,900	1%	83,900	1%	144,700	2%
E-3: Improve grid stability and resilience.	N/A any carbon impacts from microgrids are captured in E-2					
E-4: Purchase Utility-Scale Renewable Energy	0	0%	1,846,100	20%	0	0%
M-1: Reduce vehicle miles traveled (VMT) through coordinated and planned development	204,500	2%	409,000	5%	818,000	8%
M-2: Shift trips to bicycling and walking by expanding a network of safe and accessible routes	183,300	2%	366,700	4%	733,300	8%
M-3: Shift trips to transit by building convenient transit systems and mobility hubs	28,300	0%	53,500	1%	106,900	1%
M-4: Reduce vehicle emissions from idling by reducing congestion and improving parking management	79,100	1%	158,300	2%	316,500	3%
M-5: Reduce vehicle emissions through low- and no-emission vehicles	292,100	3%	502,000	6%	696,200	7%
Total Emissions Reduction from BAU	2,352,500	27%	6,438,300	71%	8,557,400	88%
Remaining GHG Emissions	6,357,200		2,583,300		1,129,000	

[Click here for full plan](#)

Equivalent HERS Scores for International Energy Conservation Code (IECC) years for Climate Zone 4

IECC Code Year	Equivalent HERS Score
2006	92
2009	82
2012	76
2015	74
2018	61
2021	51

Information obtained from Sharla Riede, May 2024