

ORDINANCE NO. _____

**AN ORDINANCE OF THE COUNCIL OF THE CITY OF GLENDALE,
CALIFORNIA AMENDING THE 2026 GLENDALE BUILDING AND SAFETY
CODE, VOLUME IX (GREEN BUILDING STANDARDS) TO REQUIRE ENERGY
CONSERVATION MEASURES FOR AIR CONDITIONER ALTERATIONS,
REPLACEMENTS AND INSTALLATIONS IN EXISTING SINGLE-FAMILY
RESIDENTIAL BUILDINGS, AND REQUIRED FINDINGS RELGATED
THERETO**

WHEREAS, this ordinance amends the 2026 Glendale Building and Safety Code to add reach codes to Volume IX Green Building Standards that requires installation of heat pumps or energy efficiency measures when air conditioners are altered, replaced or installed in existing single-family residential buildings – these standards do not apply to repair of existing AC systems (this ordinance is referred to herein as “Ordinance” or “Reach Code”); and

WHEREAS, AB 130 (inclusive of Health & Safety Code section 17958), signed into law and effective in July 2025, allows cities to amend, add, or repeal ordinances or regulations in the adopted Building & Safety Code that are applicable to residential units after September 30, 2025, only if express written findings can be made based on meeting certain conditions; and

WHEREAS, the proposed Ordinance meets a condition set forth in Health and Safety Code section 17958(b)(5) that will allow amendment, which condition requires, “[t]he changes or modifications are necessary to implement a local code amendment that is adopted to align with a general plan approved on or before June 10th 2025, and that permits mixed fuel residential construction consistent with federal law while also incentivizing all electric construction as part of an adopted greenhouse gas emissions reduction strategy.” (the “General Plan Exception”); and

WHEREAS, the “General Plan Exception” consists of three components including: (i) that the amendments are aligned with a general plan adopted before June 10, 2025; (ii) that the amendments permit mixed-fuel residential construction consistent with federal law, and (iii) that the amendments incentivize electrification as part of a greenhouse gas reduction strategy; and

WHEREAS, the City Council finds and determines that the proposed Reach Code meets all three components of the General Plan Exception; first, it aligns with policies of the City’s General Plan Safety Element, adopted on April 1, 2025, specifically:

- Safety Element, Policy 5-2: Building Resilience, which states that the City shall amend the building code to increase the resiliency of existing and new buildings, thereby protecting residents from the impacts of extreme heat and poor air quality, because the ordinance proposes an amendment to the 2026 Building Code that applies to existing and new residential buildings and increases climate resiliency because heat pumps can completely or partially

replace natural gas powered HVAC that relies on fossil fuel. Heat pumps rely on electric power which power is increasingly generated by non-carbon power sources and therefore reduces GHGs; and

- Safety Element, Program 5-2.3, specifies that the City shall consider amending the building code to require all newly installed HVAC units for existing buildings to have two-way air conditioning unit capability to provide heating and cooling because heat pumps are a two-way air conditioning system and is being proposed to amend the Building and Safety code in the next CBC update cycle; and

Second, the Reach Code is consistent with the federal Energy Policy and Conservation Act (EPCA) because it permits mixed-fuel residential construction and does not preclude the use of natural gas because the Ordinance allows Reach Code compliance through either installation of the all-electric heat pump, or installation of energy efficiency upgrades when installing, replacing or altering an air conditioning system but relying on a gas furnace for space heating (Reach Code Sections A4.204.1.1a and A4.204.1.1b); and

Third, the proposed AC2HP reach code incentivizes all-electric construction consistent with Glendale's adopted 2012 Greener Glendale Plan and the Climate Action and Adaptation Plan (CAAP) adopted on August 12, 2025, which plans contain strategies to reduce GHGs in citywide energy consumption by facilitating permitting and construction of alternative building structures, materials and site location, retrofitting existing development for increased energy and water efficiency, and promoting and supporting use of renewable energy; and

WHEREAS, the City Council finds and determines that the following GGP objectives and strategies and CAAP measures and action incentivize all-electric construction and that the Ordinance is consistent with and aligns with these plans, specifically:

- GGP Objective Urban Design 3 – Consider expansion of the City's Green Building Standards CAL Green provides for cities to adopt a wide range of green building standards in addition to the state requirement. In 2011, These requirements included Urban Design energy efficiency measures as:

- o Strategy UD 3-A: Expand Green Building Standards to exceed the minimum requirements as set forth in the California Green Building Code (CALGreen) Projects must exceed California Energy Code requirements by 15%.

- GGP Objective Energy 4 – Encourage the reduction of energy consumption through City municipal codes and policies:

- o Strategy EC 4: Facilitate permitting and construction of alternative building structures, materials, and site locations; and

- CAAP Measure BLD-2: Require healthy, safe, decarbonized and resilient

new buildings by 2026:

- o Action BLD 2.1: Based on available legal pathways, implement a new building electrification ordinance which limits the installation of new natural gas infrastructure to improve health, safety, and reduce costs associated with new construction;
 - o Action BLD 2.4: Amend the building code to require all newly installed HVAC units for new buildings to have two-way air conditioning capabilities to provide heating and cooling; and
- CAAP Measure BLD-3: Retrofit 25% of existing buildings by 2030 and 95% by 2045 to be zero-carbon and resilient to extreme heat and wildfires:
 - o Action BLD 3.1: By 2026, complete an existing building electrification study to identify costs and benefits associated with retrofitting residential and commercial building systems, including long-term costs of transitioning fuel use. Based on the findings of the report, identify, and adopt additional cost effective, equitable, and implementable building electrification requirements for existing buildings;
 - o Action BLD 3.4: Adopt an electrification-on-replacement ordinance for residential hot water heaters and HVAC systems by 2027; and

WHEREAS, California Health and Safety Code Sections 17958.5, 17958.7 and 18941.5 allow cities to make changes or modifications to the building standards contained in the California Building Standards based upon express findings that such changes or modifications are reasonably necessary because of local climactic, geological or topographical conditions; and

WHEREAS, the City Council also finds and determines that the Ordinance is, pursuant to Health & Safety Code sections 17958.5 and 17958.7, reasonably necessary because of local climactic conditions because Glendale sits in the Los Angeles Air Basin which is in “nonattainment” status for ozone, and is in “serious non-attainment” for carbon monoxide, which greenhouse gas air pollutants are caused principally from burning fossil fuels for electricity or heat and transportation, and that adoption of the Ordinance will reduce these and other greenhouse gas pollutants and address these climactic conditions through implementation of all-electric technology for household heating and cooling; and

WHEREAS, California Green Building Standards Code Section 101.7.1 provides that local climactic, geological or topographical conditions include environmental conditions established by a city, county, or city and county through findings; and

WHEREAS, the City Council finds that each of the amendments, additions and deletions to the California Green Building Standards Code and California Energy Code contained in this Ordinance are reasonably necessary because of local climactic, geological or topographical conditions described in Attachment “A” to this Ordinance; and

WHEREAS, in addition to these findings, various state orders and statutes are targeted to greenhouse gas emission reduction, including but not limited to, Executive Order N-79-20, the Advanced Clean Cars II program which prohibits the sale of internal combustion passenger vehicles beyond 2035, and the California Green Building Standards Code which contains mandatory green building provisions, as well as a range of voluntary measures, known as CALGreen Voluntary Tier 1 and Tier 2, relating to energy efficiency and renewable energy; and

WHEREAS, California Public Resources Code Section 25402.1(h)(2) and Section 10-106, of the Building Energy Efficiency Standards (Standards) establish a process which allows local adoption of energy standards that are more stringent than the statewide Standards, provided that such local standards are cost effective, and that the California Energy Commission finds that the local standards will require buildings to be designed to consume no more energy than permitted by the California Energy Code; and

WHEREAS, the cost effectiveness studies prepared by the California Statewide Investor Owned Utilities Codes and Standards Program, and which are attached to the November 4, 2025 staff report demonstrate that the local amendments are cost-effective and do not result in buildings consuming more energy than is permitted by the 2026 California Energy Code or the 2026 Code updates adopted on November 4, 2025; and

WHEREAS, following adoption of this Ordinance the local amendments to the 2026 California Energy Code as amended into the 2026 Glendale Building and Safety Code will, in accordance with Public Resources Code Section 25402.1(h)(2) and Section 10-106 of the 2022 California Administrative Code (Title 24, Part 1), be submitted to the California Building Standards Commission for filing and will be submitted to the California Energy Commission for approval.

BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF GLENDALE:

SECTION 1. Recitals

The City Council finds the foregoing recitals to be true and correct and hereby incorporates the recitals into this Ordinance.

SECTION 2. Purpose And Intent

It is the purpose and intent of this Ordinance to adopt the local amendments to the 2026 California Energy Code (Title 24, Part 6 and Part 11) that provide local, cost effective standards for existing residential, that exceed the minimum standards of the 2026 California Energy Code and 2026 California Green Building Standards Code to achieve energy savings, reduce local pollution, reduce greenhouse gas emissions, and address unique local climactic, geological, and topographical conditions. The requirements of this chapter shall not affect any other state or local requirements related to the delivery of affordable housing, including but not limited to state and local density bonus

requirements under Government Code Section 65915 et seq. and G.M.C Chapter 4.11, Chapter 30.35 and Chapter 30.36. Furthermore, nothing in this local amendment negates the requirement of new construction to comply with State code minimums.

SECTION 3. LOCAL AMENDMENTS TO ENERGY CODE

Volume IX (Green Building Standards) of the 2026 Glendale Building and Safety Code, is hereby amended as follows (underlined for additions and ~~strike-through~~ for deletions):

A4.204.1 Energy Efficiency. Alterations to existing residential buildings shall comply with Sections A4.204.1.1 and ~~A4.204.1.2~~.

A4.204.1.1 Altered Space-Conditioning System Serving Existing Single-Family Dwelling Units – Mechanical Cooling. When a space-conditioning system serving an existing single-family dwelling unit is altered in climate zones 1 through 14 and 16 by installation or replacement of an air conditioner, the altered system shall comply with either a or b below in addition to the requirements for installation specified by Title 24, Part 6, Sections 150.2(b)1E and 150.2(b)1F:

- a. A heat pump shall be the primary heating source and sized according to the system selection requirements specified by Title 24, Part 6 of Section 150.0(h)5. Supplemental heating may be provided by ~~an existing~~ gas furnace or ~~existing~~ electric resistance heating as specified in Title 24, Part 6, Sections 150.0(h)7 and 150.0(i); or
- b. An air conditioner shall meet the following all the requirements in either subsection I or II below:

I. Systems with Existing Duct Distribution Systems:

~~I. R-8 duct insulation for ducts located in unconditioned space; and~~

A. II. ~~The~~ duct system measured air leakage shall be equal to or less than 510 percent of the system air handler airflow as confirmed through field verification and diagnostic testing, per the requirements in Title 24, Part 6, Reference Residential Appendix Section RA3.1.4.3.1; and

Exception 1 to A4.204.1.1bIA. If it is not possible to meet the duct sealing requirements, all accessible leaks shall be sealed and verified through a visual inspection and a smoke test by a certified ECC-Rater utilizing the methods specified in Reference Residential Appendix Section RA3.1.4.3.5.

Exception 2 to A4.204.1.1bIA: Existing duct systems, constructed, insulated or sealed with asbestos.

B. III. ~~Demonstrate,~~ in every control mode, airflow greater than or equal to ~~400~~ 300 CFM per ton of nominal cooling capacity through the return grilles, and an air-handling unit fan efficacy less than or equal to 0.45 W/CFM. The airflow rate and fan efficacy requirements in this section shall be confirmed through field verification and diagnostic testing, following the procedures outlined in Title 24, Part 6, Reference Residential Appendix RA3.3; and

Exception 1 to A4.204.1.1bIB: Systems unable to comply with the minimum airflow rate and system efficacy requirements shall demonstrate compliance by satisfying all of the following:

1. Following the procedures in Section RA3.3.3.1.5;
2. Installing a system thermostat that conforms to the specifications in Section 110.12;
3. For standard ducted systems (without zoning dampers), meet the applicable minimum total return filter grille nominal area requirements in Table 150.0-B or 150.0-C as confirmed by field verification and diagnostic testing in accordance with the procedures in Reference Residential Appendix Sections RA3.1.4.4 and RA3.1.4.5. The design clean-filter pressure drop requirements specified by Section 150.0(m)12D for the system air filter(s) shall conform to the requirements given in Tables 150.0-B and 150.0-C.

Exception 2 to Section A4.204.1.1bIB: Multispeed compressor systems or variable speed compressor systems shall verify air flow (cfm/ton) and fan efficacy (Watt/cfm) for system operation at the maximum compressor speed and the maximum air handler fan speed.

Exception 3 to Section A4.204.1.1bIB: Gas furnace air-handling units manufactured prior to July 3, 2019 shall comply with a fan efficacy value less than or equal to 0.58 W/cfm as confirmed by field verification and diagnostic testing in accordance with the procedures given in Reference Residential Appendix RA3.3.

- C. ~~IV.~~ In all climate zones, refrigerant charge verification requirements shall meet the requirements in Title 24, Part 6 Section 150.2(b)1Fiib, including the minimum airflow rate specified in Section 150.2(b)1Fiia; and
- D. ~~V.~~ Vented attics shall have insulation installed to achieve a U-factor of 0.020 or insulation installed at the ceiling level shall result in an insulated thermal resistance of R-49 or greater for the insulation alone; luminaires not rated for insulation contact must be replaced or retrofitted with a fireproof cover that allows for insulation to be installed directly over the cover; and

Exception 1 to Section A4.204.1.1(b)ID: Dwelling units with at least R-38 existing insulation installed at the ceiling level.

Exception 2 to Section A4.204.1.1(b)ID: Dwelling units where the alteration would directly cause the disturbance of asbestos unless the alteration is made in conjunction with asbestos abatement.

Exception 3 to Section A4.204.1.1(b)ID: Dwelling units with knob and tube wiring located in the vented attic.

Exception 4 to Section A4.204.1.1(b)ID: Where the accessible space in the attic is not large enough to accommodate the required R-value, the entire accessible space shall be filled with insulation provided such installation does not violate Section 806.3 of Title 24, Part 2.5.

- E. VI. Air seal all accessible areas of the ceiling plane between the attic and the conditioned space including all joints, penetrations and other openings that are potential sources of air leakage by caulking, gasketing, weather-stripping or otherwise sealing to limit infiltration and exfiltration.

Exception 1 to Section A4.204.1.1bIE: Dwelling units with at least R-38 existing insulation installed at the ceiling level.

Exception 2 to Section A4.204.1.1 bIE: Dwelling units where the alteration would directly cause the disturbance of asbestos unless the alteration is made in conjunction with asbestos abatement.

Exception 3 to Section A4.204.1.1bIE: Dwelling units with atmospherically vented space heating or water heating combustion appliances located inside the pressure boundary of the dwelling unit.

II. Entirely New or Complete Replacement Duct Systems:

- A. I. R-8 duct insulation shall be installed for all new ducts located in unconditioned space; and
- B. II. The total duct system measured air leakage shall be equal to or less than 5 percent of the system air handler airflow as confirmed through field verification and diagnostic testing, per the requirements in Title 24, Part 6, Reference Residential Appendix Section RA3.1.4.3.1; and
- C. III. Demonstrate, in every control mode, airflow greater than or equal to 400350 CFM per ton of nominal cooling capacity through the return grilles, and an air-handling unit fan efficacy less than or equal to 0.35 W/CFM. The airflow rate and fan efficacy requirements in this section shall be confirmed through field verification and diagnostic testing, following the procedures outlined in Title 24, Part 6, Reference Residential Appendix RA3.3; and
- D. IV. In all climate zones, refrigerant charge verification requirements shall meet the requirements in Title 24, Part 6 Section 150.2(b)1Fiib; and
- E. V. In Climate Zones 1-4, 6, and 8-16 if the air handler and ducts are located within a vented attic, vented attics shall have insulation installed to achieve a U-factor of 0.020 or insulation installed at the ceiling level shall result in an insulated thermal resistance of R-49 or greater for the insulation alone; luminaires not rated for insulation contact must be replaced or retrofitted with a fireproof cover that allows for insulation to be installed directly over the cover; and

Exception 1 to Section A4.204.1.1bIIE: In Climate Zones 1, 3, and 6, dwelling units with at least R-19 existing insulation installed at the ceiling level.

Exception 2 to Section A4.204.1.1bIIE: Dwelling units where the alteration would directly cause the disturbance of asbestos unless the alteration is made in conjunction with asbestos abatement.

Exception 3 to Section A4.204.1.1bII E: Dwelling units with knob and tube wiring located in the vented attic.

Exception 4 to Section A4.204.1.1bII E: Where the accessible space in the attic is not large enough to accommodate the required R-value, the entire accessible space shall be filled with insulation provided such installation does not violate Section 806.3 of Title 24, Part 2.5.

- F. ~~VI.~~ In Climate Zones 2, 4, and 8-16, ~~a~~ Air seal all accessible areas of the ceiling plane between the attic and the conditioned space including all joints, penetrations and other openings that are potential sources of air leakage by caulking, gasketing, weather-stripping or otherwise sealing to limit infiltration and exfiltration.

Exception 1 to Section A4.204.1.1bII F: Dwelling units with at least R-19 existing insulation installed at the ceiling level.

Exception 2 to Section A4.204.1.1bII F: Dwelling units where the alteration would directly cause the disturbance of asbestos unless the alteration is made in conjunction with asbestos abatement.

Exception 3 to Section A4.204.1.1bII F: Dwelling units with atmospherically vented space heating or water heating combustion appliances located inside the pressure boundary of the dwelling unit.

Exception 1 to Section A4.204.1.1: Where the capacity of the existing main electrical service panel is insufficient to supply the electrical capacity of a heat pump and where the existing main electrical service panel is sufficient to supply a new or replacement air conditioner, as calculated according to the requirements of California Electrical Code Article 220.83 or Article 220.87. Documentation of electrical load calculations in accordance with Article 220 must be submitted to the enforcement agency prior to permitting for both the heat pump and proposed air conditioner.

Exception 2 to Section A4.204.1.1: Where the required capacity of a heat pump to meet the system selection requirements of Section 150.0(h)5 is greater than or equal to 12,000 Btu/h more than the greater of the required capacity of an air conditioner to meet the design cooling load OR the capacity of the existing air conditioner. Documentation of heating and cooling load calculations in accordance with 150.0(h) must be submitted to the enforcement agency prior to permitting for both the heat pump and proposed air conditioner.

SECTION 4. Severability.

This Ordinance's provisions are severable. If any portion of this Ordinance or its application to any person or circumstance is held invalid or unconstitutional, that decision does not affect the validity of the Ordinance's remaining portions and the Ordinance's application to other persons and circumstances. The City Council declares that it would have passed the remainder of this Ordinance without the invalid or unconstitutional provision.

SECTION 5. CEQA Findings.

The City Council finds and determines that this Ordinance is exempt from review under the California Environmental Quality Act (California Public Resources Code §§15000, et seq., "CEQA"), and the regulations promulgated thereunder (14 California Code of Regulations §§15000, et seq., the "CEQA Guidelines") because it consists of revisions and clarifications to an existing code of construction-related regulations and specification of procedures related thereto being taken for enhanced protection of the environment and while there may be added infrastructure resulting from the implementation of the Reach Codes, it does not have the potential to cause significant effects on the environment; to the contrary, the transition from fossil fuel sources is part of the State of California's overall plan to decrease GHG emissions from stationary and transportation sources. Adoption of the Ordinance is categorically exempt in accordance with CEQA Guidelines §15305 as a minor alteration in land use limitations which do not result in any changes in land use or density and is exempt under CEQA Guidelines §15308 as an action taken by a regulatory agency as authorized by California law to assure maintenance or protection of the environment.

SECTION 6. Effective Date.

This Ordinance shall take effect and be in force thirty (30) days after the date of its passage.

SECTION 7. Certification.

The City Clerk is directed to certify the passage and adoption of this Ordinance; cause it to be entered into the City's book of original ordinances; make a note of the passage and adoption in the records of this meeting; and within fifteen (15) days after the passage and adoption of this Ordinance, cause it to be published or posted in accordance with California law.

Adopted by the Council of the City of Glendale on the ____ day of _____, 2025.

Mayor

ATTEST:

City Clerk

STATE OF CALIFORNIA)
) SS.
COUNTY OF LOS ANGELES)

I, Dr. Suzie Abajian, City Clerk of the City of Glendale, hereby certify that the foregoing Ordinance was adopted by the Council of the City of Glendale, California, at a regular meeting held on the _____ day of _____, 2025, and that the same was adopted by the following vote:

Ayes:

Noes:

Absent:

Abstain:

City Clerk

Attachment A:

Local climactic, geological or topographical conditions

1. Reach Code requiring AC2HP Replacement

Finding No. 1: Climactic:

The burning of fossil fuels used to heat structures, heat water for cooking, and for other uses is a significant contributor to greenhouse gas emissions and climate change. Combustion of natural gas and petroleum products for heating and cooking emit carbon dioxide, methane, and nitrous oxide. Emissions from natural gas consumption represented 46% of total annual U.S. energy-related CO₂ emissions in 2021¹. Scientists attribute the global warming trend observed since the mid-20th century to the human expansion of the 'greenhouse effect' warming that results when the atmosphere traps heat radiating from Earth towards space. Long lived gasses such as carbon dioxide can persist in the atmosphere for more than 100 years, even with efforts to reduce emissions today. Nitrous oxide, carbon dioxide, and methane are gases that contribute to the greenhouse gas effect².

Global climate change imposes substantial local impacts and risks on the Los Angeles Area, and thus the City of Glendale, including rising temperatures, changing precipitation patterns and amounts, sea level rise, flooding, drought, and wildfire. A general summary of climate risks facing the Los Angeles Area and City of Glendale are as follows:

- **Increased temperatures and extreme heat events.** The Los Angeles region is expected to experience an increase in average maximum temperatures of 4-5 degrees Fahrenheit by mid-century, and 5-8 degrees Fahrenheit by late-century, with the duration and intensity of extreme heat events increasing as well.
- **Changes in Rainfall Intensity.** By mid-century, more precipitation is projected to occur in winter in the form of less frequent but larger events. Most climate models predict drying trends across the State by 2100.
- **Increased Risk of Large Wildfires.** A hotter, drier climate is projected to increase wildfires across southern California, though there remains some uncertainty in quantifying future changes of burned area in the region.
- **Exacerbation of Air Quality Problems.** If temperatures rise to the medium warming range, there could be 75% to 85% more days with weather conducive to ozone formation, relative to today's conditions. This is more than twice the increase expected if rising temperatures remain in the lower warming range. This

¹ U.S. Energy Information Administration, Where Greenhouse Gases Come From, 2021.

<https://www.eia.gov/energyexplained/energy-and-the-environment/where-greenhouse-gases-come-from.php#:~:text=In%202021%2C%20petroleum%20accounted%20for,energy%2Drelated%20CO2%20emissions.>

² NASA, Causes of Climate Change, as of November 25, 2020, <https://climate.nasa.gov/causes/>. 4 NASA, Causes of Climate Change, as of November 25, 2020, <https://climate.nasa.gov/causes/>.

increase in air quality problems could result in an increase in asthma and other health-related problems.

- **Sea Level Rise.** 1-2 feet of sea level rise is projected by the mid-century, and most extreme projections lead to 8-10 feet by the end of the century, especially affecting LA County as a whole⁵.

An AC2HP program has a significant positive effect on energy resource efficiency, waste and pollution generation, and the health of building occupants over the life of the building. As a result of the high temperatures, which are expected to rise in the future due to the effects of climate change, average load demand and peak load demand of energy used in Glendale are important factors impacting public safety and creating the potential for adverse economic impacts due to power outages or power reductions (i.e. “brownouts”). Reduction of total and peak energy use because of incremental conservation measures required by this ordinance will have local benefits in the additional available system energy capacity. Furthermore, the reduction of greenhouse gas emissions from all-electric buildings will help mitigate climate change and its negative effects such as extreme heat, droughts, intense storms, and flooding, thus making these amendments reasonably necessary because of local climactic reasons.

Finding No. 2: Geologic

- The Los Angeles area is densely populated and located in an area of high seismic activities. Concern for fire-life safety associated with gas appliances and associated piping located in the ground and in buildings increases with the risk of explosion or fire if there is a structural failure due to a seismic event considering the increasing number of buildings in the region.
- The risk of natural gas infrastructure and pipeline explosions and fires are magnified in cases of major earthquakes, for example, the 2010 San Bruno pipeline explosion.
 - Severe seismic events could disrupt communications, damage gas mains, and place increased demands on the dispersed resources of the Fire Department necessary for the life safety needs of the community
- Reducing gas infrastructure in existing single family units will also reduce the risks of fires and explosions, particularly after seismic events, which will further save the City money by reducing disaster response and recovery costs

The elimination of gas infrastructure in future construction will reduce risk of geologic risk via natural gas infrastructure, making these amendments necessary because of local geologic/ seismic reasons.

⁵ California's Fourth Climate Change Assessment, Los Angeles Regional Report, 2018.
https://www.energy.ca.gov/sites/default/files/2019-11/Reg%20Report-%20SUM-CCCA4-2018-007%20LosAngeles_ADA.pdf.