

July 16, 2015

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Dear Commissioners:

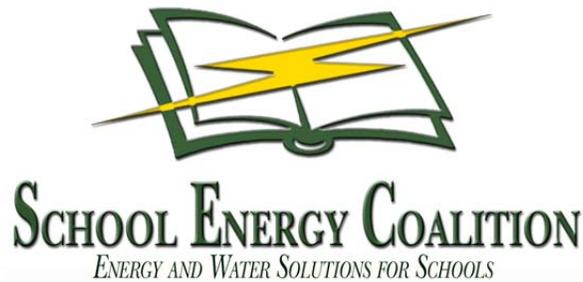
The School Energy Coalition (SEC), an organization made up of K-12 schools, community colleges, school construction and energy consultants focused on energy and water efficiency and renewable generation projects for California's students, is pleased to share our initial comments relative to proposed water efficiency standards effecting a reduction in outdoor irrigation water usage: Chapters 1, 2, 3 and 5, California Green Building Standards Code (CALGreen), Part 11 of Title 24; and proposed building standards to add Sections 4-501 through 4-507 as Group 3 of Chapter 4, California Administrative Code, Part 1 of Title 24 pertaining to Sustainable Construction of Public Schools and Community Colleges, to be voted on July 21, 2015.

SEC has appreciated the opportunity to participate in stakeholder meetings with the Division of State Architect (DSA) to discuss these new regulations which we know are being developed with great urgency in light of the ongoing drought situation in the state.

School districts are aware that the continuing drought is of great concern and agree steps must be taken to ensure that less potable water is used going forward on school sites and for water customers everywhere, however, they have very little resources with which to accomplish additional landscaping requirements.

In addition, most school districts are already under severe restrictions per their local or regional water suppliers and must find ways to cut back their use generally in light of recent mandates to conserve. This will require schools to make decisions about allowing some outside landscaping, particularly turf areas, to go dry. Schools are now struggling to find ways to balance these mandates with requirements for physical education, shared recreational space with municipalities and other local partners.

Therefore, we appreciate the changes that have been made to the regulations to focus on new construction only and hope you will consider minimizing added administrative costs above and beyond the landscaping projects themselves in the comment period ahead. We understand there will be a 180-day comment period should these regulations be adopted on July 21, 2015, and we look forward to providing more detailed comments during that period.



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At this time we would only point out that we have provided input to earlier versions of the language and support the continued consideration of the following:

- SEC appreciates that schools will be allowed to show they are complying with the regulations by including a letter from a landscape architect when plans are submitted. DSA will simply check to ensure that it is included.
- The new building footprint on an existing school site ratio to new landscaping that meets Model Water Efficient Landscaping Ordinance (MWELo) standards is no longer 1:1. We asked that DSA consider that the building footprint already takes out that amount of square footage of landscaping that might otherwise need water. Thus, schools should be given credit for that, not asked to replace that same amount of landscaping in another area. We are not certain 75% is the correct amount, but appreciate the direction this ratio has taken.
- The full costs of this proposal are still unknown. SEC urges you to conduct a full review of the outcome of the emergency regulations before making them permanent. DSA and the Building Standards Commission should have the opportunity to fully review the effects of the new regulations on water use, evaluating whether they are achieving the goals of the Executive Order to save water in the short-term. The regulations may also need to be adjusted before being finalized in order to incorporate changes made by others, including the Department of Water Resources, which is currently reviewing and updating the MWELo. A detailed review will provide the opportunity to account for the water conservation outcomes that districts have achieved in response to the Executive Order and in furtherance of individual water agency goals.

Finally, we appreciate the DSA's efforts to turn these regulations around in a very short time period and appreciate that we were able to provide input thus far in stakeholder meetings. Please do not hesitate to contact me with any questions regarding the information contained in this letter.

Thank you for the opportunity to participate in this process.

Sincerely,

Anna M. Ferrera
Executive Director
School Energy Coalition