

December 8, 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 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.

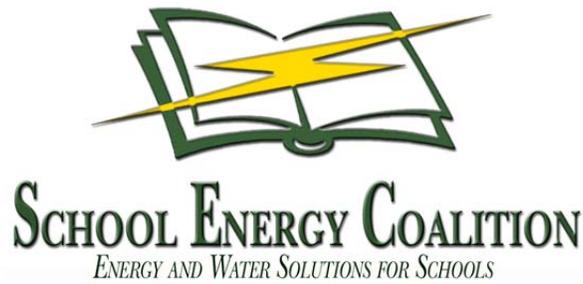
These sections are now very different in format, however, we are pleased to have only minor comments regarding this new version. SEC has appreciated the opportunity to participate in stakeholder meetings with the Division of State Architect (DSA) to discuss these new regulations which we know have been developed with 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 will be 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. These supplier restrictions are also requiring schools to make decisions about landscaping such as 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. These new state building standards will be added to this mandate mix if a school district is seeking to expand or build new as needed.

To that end the following are our remaining comments on these proposed standards changes:

- SEC appreciates the self-certification section that continues to allow schools to comply via a letter and documents from an architect, landscape architect or civil engineer to be checked by DSA. Our understanding is that any problem with this section alone will not halt a school new construction or modernization project from moving forward.



- SEC appreciates the exception that has been made to Chapter 3 Green Building Code, Section 301.4.1 that will allow an exception for buildings less than 1,600 square feet that allows one standard portable or special education classroom to be installed without requiring additional landscape work. It remains to be seen how this exception works as a practical matter with a much lower trigger of 500 square feet now proposed for new landscape areas from 2,500 square feet.
- SEC would suggest in order to better clarify the definition of newly constructed landscapes in Chapter 5 Non-Residential Mandatory Measures Division 5.3 Water Efficient and Conservation Section 5.304 Outdoor Water Use Section 5.304.5.1 that the definition language for "Newly constructed Landscapes" be amended to read "New construction landscape projects..." so that is comparable to the language in Section 5.304.5.2 for "Rehabilitated landscapes."
- SEC would also appreciate a clarification by DSA of their internal process for "banking" compliant projects and what occurs when schools make use of recycled or recaptured water as this has been removed from the standards.
- SEC would also appreciate a clarification of when a school might best avail themselves of using the prescriptive method or checklist in Appendix D. One way of handling this may be to issue a clarifying policy document or FAQ. We have discussed this idea with DSA and SEC believes this will assist schools to understand and comply with these new requirements.
- SEC continues to raise the concern that the full costs of this proposal are still unknown. SEC asks that a review of the outcome of the regulations compared to the costs perhaps at the one year mark.

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