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COALITION  
*for* ADEQUATE  
SCHOOL HOUSING<sup>SM</sup>

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December 16, 2009

E. David Walls, Executive Director  
California Building Standards Commission  
2525 Natomas Park Drive, Suite 130  
Sacramento, CA. 95833

RE: Proposed Green Building Standards Being Considered in the 15-Day Period Ending  
December 16, 2009

Dear Mr. Walls:

The Coalition for Adequate School Housing (C.A.S.H.) by way of this letter offers comment addressing the second "Green Building Code" published in the recent 15-day comment period. It is important to note again that C.A.S.H. supports efforts toward sustainability, energy and water conservation, the recycling of waste and believes that such objectives should be at the core of planning for each new school building and, to the extent practical, in the planning for the modernization of existing buildings. We find, however, that we must again offer recommendations.

The proposed "Construction Waste Reduction, Disposal and Recycling," beginning with Section 5.408.1 through Section 5.408.3, would require a waste diversion program that as written would be overseen by the DSA office. While we support efforts to deal with waste disposal and recycling, we believe that it should not be in the code as a requirement. DSA project close-outs are an issue for school districts today; the issues of close-out are rooted in the lack of documentation by school districts. The purpose of the DSA close-out process is to certify that school buildings have been constructed and built to strict safety requirements under Title 24 and the Field Act. Mandating the reduction, disposition and recycling of construction waste would require additional documentation by a school district for future project close-outs that has no relevance to determining the safety of the building. The lack of DSA certification, however, for any reason, including a district's inability to document compliance with Section 5.408.1 et al., may suggest that a building is unsafe. C.A.S.H. proposes that it work with DSA and the Building Standards Commission to develop Best Practices Guidelines for Construction, Waste Reduction Disposal and Recycling.

C.A.S.H. offers its thanks to both the Division of the State Architect and the Building Standards Commission in considering our comments.

Sincerely,

Thomas G. Duffy  
Legislative Director

cc: David Thorman, State Architect, Division of the State Architect  
Theresa Townsend, Division of the State Architect  
C.A.S.H. Board of Directors