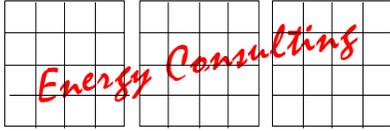


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California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento CA 95833

June 7, 2011

Attention: Dave Walls, executive director

RE: CALGreen Appendix 4, item 4.405.3 Tier 1 prerequisite requirement

Dear Mr. Walls;

As a member of the Green Building Code Advisory Committee I have been closely involved with CALGreen from it's inception through its current implantation process. I continue to respect the efforts contributing to this revolutionary code and am proud to have played a small part in it.

As a practicing green building consultant I've been involved in many projects and starting January 1 this year prepared dozens of CALGreen submittals for new California buildings.

For the most part, it has gone well but I've encountered one significant problem regarding residential projects. Many of the jurisdictions here in the San Francisco Bay Area have adopted the Tier 1 CALGreen requirements. I applaud these cities and counties for stepping up their green building requirements beyond the Mandatory requirements but I believe that **Section A4.405.3 should NOT be included in the Tier 1 prerequisite category**. While use of recycled materials is laudable when feasible, my experience has been that it is nearly impossible to meet the required 10% recycled content based on material costs for any residential project. We have searched for sources of recycled content materials for homebuilders and can't find nearly enough available products to achieve the 10% dollar value required by this section.

As a member of the CALGreen committee of the Redwood Empire Association of Code Officials, I've presented this issue to Building Officials here, and they agree that A4.405.3 imposes a near impossible requirement on new homes. While CALGreen allows local jurisdictions to amend or modify Tier 1 measures, it makes vastly better sense to just remove the prerequisite requirement.

I suggest that A4.405.3 remain as a Tier 1 measure but that it be removed from the required prerequisite category. This would allow anyone to incorporate the measure and include it as an elective option, but would not force applicants to search for solutions that don't yet exist.

If the Commission feels another Tier 1 prerequisite should be added to offset the removal of A4.405.3 in Division 4.4, I would suggest that A4.407.4 is a prime candidate. It makes great good sense to require that building materials delivered to the site *should* be protected from rain and other sources of moisture.

Thanks for the opportunity to comment on this matter.

A handwritten signature in black ink that reads 'Bill Mattinson'.

Bill Mattinson
ICC certified CALGreen inspector 8111517