

Wednesday, May 30, 2012

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

<b>DOCKET</b>	
<b>12-BSTD-1</b>	
DATE	MAY 30 2012
RECD.	MAY 30 2012



**RE: Docket # 12-BSTD-1, adoption of 15-day language**

The Global Cool Cities Alliance supports the proposed changes to the 2013 Building Energy Efficiency Standards, Title 24. We are pleased to see the increase in reflectivity requirements for low-sloped roofs and steep-sloped roofs in the prescriptive option for non-residential buildings, and the added solar reflectance requirements for steep-sloped roofs on high-rise residential buildings, hotels and motels. These increased reflectivity requirements take an appropriate step towards further reducing California's building energy consumption in a cost effective manner.

Additionally, beyond the building energy benefits of increasing the solar reflectance requirements, numerous societal benefits will accrue from the proposed changes. Extensive scientific literature has demonstrated that increasing the reflectivity of roofs in urban areas reduces the ambient air temperature, thus reducing the urban heat island effect. Reduced air temperatures improves air quality, further reduces the need for air conditioning, makes un-conditioned spaces more comfortable and productive, and increases the resilience of human populations to heat events. Reduced heat sharply slows the rate at which air pollutants – VOCs and NOx - cook into smog. Thus cooler urban temperatures can reduce smog formation in population centers.

We applaud the California Energy Commission's leadership in embracing cool roofs as a cost-effective way to reduce California's building energy consumption and protect its urban populations from rising temperatures.

We encourage you to adopt the proposed changes in the following sections without further revisions:

- 140.3 Non Residential Prescriptive Envelope (including both commercial and high rise residential buildings)
- 141.0 Non Residential Additions, Alterations, and Repairs (including both commercial and high rise residential buildings)

Best regards,

Handwritten signature of Kurt Shickman in blue ink.

Kurt Shickman  
Executive Director  
Global Cool Cities Alliance

Handwritten signature of Art Rosenfeld in black ink.

Dr. Art Rosenfeld  
Director, Global Cool  
Cities Alliance  
Former California Energy  
Commissioner, 2001 -  
2010

Handwritten signature of Greg Kats in black ink.

Greg Kats  
Director, Global Cool  
Cities Alliance  
Venture Partner, Good  
Energies  
President, Capital E

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Dr. Stephen Wiel  
Director, Global Cool  
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Utility Commissioner