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<td>Impact Urban Comments - Site Eligibility</td>
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Comment Received From: Impact Urban
Submitted On: 4/3/2020
Docket Number: 19-ERDD-01

Site Eligibility

Additional submitted attachment is included below.
April 3, 2020

To Whom It May Concern:

We are excited for the opportunity to collaborate with the CEC to advance housing affordability, equity, sustainability, and resiliency through the EPIC challenge. We attended the draft solicitation webinar and submit this comment in regards to site eligibility, specifically on-campus student housing.

As a brief introduction, we are development partners who joined with the University of California Davis in a public-private partnership to build UC Davis West Village, a pioneering Zero Net Energy community.

We understand the CEC’s goals for this funding opportunity are to serve low-income/disadvantaged communities and foster innovation capable of disrupting housing delivery in California. By opening eligibility to on-campus student housing sites, the CEC would capture an opportunity to address housing affordability, innovation, and sustainability—key goals pursued by this initiative. On-campus student housing would be an ideal setting to advance the EPIC challenge goals for these key reasons:

1. **There is a housing affordability crisis in California higher education.** Our housing affordability crisis extends beyond families and individuals to higher education students.
   - 4% of University of California students experience homelessness ([University of California Undergraduate Experience Survey 2018](https://www.universityofcalifornia.edu/assets/2020-01/Undergraduate-Experience-Survey-2018.pdf))
   - 11% of California State University students experience homelessness ([California State University Basic Needs Initiative 2018](https://www.calstate.edu/newsroom/2018/11/15/california-state-university-launches-second-annual-basic-needs-initiative/))
   - 19% of California community college students experience homelessness ([California Community Colleges #RealCollege Survey 2019](https://www.cccco.ca.gov/Research/Real-College-Survey/))
   - Furthermore, in an annual survey by the California Student Aid Commission, 35% of students surveyed experienced one or more conditions of housing insecurity. ([2018-19 Student Expenses and Resource Survey (SEARS)](https://www.csac.ca.gov/ResourceCenter/StudentExpensesAndResourceSurvey))

To address our state’s housing affordability needs, the higher education student housing sector is also in dire need of affordable and sustainable housing models.
2. **Affordable student housing offers low-income and disadvantaged communities access to economic opportunity.** Many low-income students see housing as a key barrier to attending college. Additionally, students who live on campus are more likely to graduate. **We can serve California's low-income communities by offering college-bound students access to affordable, on-campus housing.** Affordable student housing expands our notion of affordable housing to also include access to the means to afford housing.

3. **On-campus housing development can leverage academic research and development to drive innovation.** In pursuit of innovation, college campuses and the private sector can partner to apply leading academic research in real-world projects subject to the rigors of market fundamentals. UC Davis West Village demonstrates an exemplar partnership between the private sector, university, energy technology experts, the electric utility, regulators, designers, and engineers.

   The project applied research expertise from UC Davis energy programs, including the California Lighting Technology Center, the Western Cooling Efficiency Center, and the Center for Water-Energy Efficiency. As a result, the buildings were designed and built to outperform the California Building Code by 50%. The community put leading-edge efficiency and renewable energy technologies to the test and by monitoring performance over time, the community continues to showcase how multi-family housing can achieve sustainability goals. But the living-learning laboratory concept is not just a one-off University experiment. Because the project was privately financed and developed, the energy strategy had to make smart business sense. In this way, the West Village development serves as a replicable model for sustainable development from an environmental and economic perspective.

4. **On-campus student housing can serve as a Living Learning Laboratory testing new technologies with an open-minded demographic and driving innovation that can be replicated in other housing markets.** The main difference between student and conventional multifamily housing is the occupants. Building technologies and research innovations are directly transferable. Innovative on-campus housing leverages an open-minded pilot demographic to test and showcase new ideas and ways of living that can transfer to conventional housing.
To draw on an example from UC Davis West Village, then CEC Commissioner, Arthur Rosenfeld, requested that the buildings have white roofs. In the spirit of trying new ideas on campus, the project team built over 50 multifamily buildings with white roofs, which became not only a prudent sustainability feature but also a visual statement about the community’s environmental values, and reference point for future developments considering cool roof design.

Ten years ago, UC Davis West Village was celebrated as the first planned zero net energy community. Then Lieutenant Governor Gavin Newsom presided over the opening ceremony. Now as Governor, he has enacted legislation requiring all new low rise multifamily projects to be zero net energy. UC Davis West Village exemplifies how academic and industry research combined with private sector knowledge and markets can drive innovation and policy change. College campus housing sites are ideal settings to apply this innovative work and we urge the CEC to open eligibility to capture this opportunity. We would be excited to put sustainability and affordability innovation to the test through the EPIC challenge proving what is possible and potentially influencing future California policy.

Thank you for your consideration,

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