

DOCKETED

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additional exception needed for low-rise residential properties (which includes single-family housing)

We are a 501(c)(3) affordable housing provider operating exclusively in California, since 1970, responsible for the development of over 3000 single and multifamily family homes.

Our recommendation is to include an additional exception for low-rise residential properties (which includes single-family housing) as follows:

Exception 7 “ Any low-rise residential property constructed through a program requiring a minimum of 500 sweat equity hours and serving households at or below 80% of Area Median Income (AMI) are exempt from the requirement to install solar PV. Residential units utilizing this exception must still comply with the “solar ready” requirements of the code.

Additionally, we wish to convey the following:

We support the development of sustainable affordable housing and work to incorporate sustainability measures in housing when feasible and/or funded by available incentive programs. However, the 2019 Energy Code, as proposed, will cause many affordable homeownership projects to be infeasible, as low and very-low income homeowners have no ability to absorb the additional cost of solar PV installation. This challenge is compounded by the fact that many appraisals do not reflect the true cost of solar PV and other energy efficiency improvements, therefore allowing limited ability to finance the cost of mandated improvements.

Programs utilizing the self-help housing model where low-income working families contribute labor to construct their homes and/or other programs utilizing volunteer sweat equity labor to offset the cost of housing should be exempt from this requirement. Non-profit providers developing affordable homeownership housing through this model will continue to partner with programs such as SASH and LIWP to ensure access to solar PV on solar ready low-rise residential units.

Note: The requirement for 500 hours and 80% Area Median Income generally ties back to other common state housing financing programs as well as national models.

Thank you for your consideration of these comments.

Sincerely,

Ken Trigueiro, Executive Vice President & CEO
Sheryl Flores, Vice President (SherylF@pshhc.org)
Peoples' Self Help Housing
San Luis Obispo County, Santa Barbara County and Ventura County