

DOCKETED

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Via Email

March 2, 2021

Comments, Docket 19-BSTD-03
California Energy Commission

Subject: Recommendations for Changes to the Current Title 24 Policies

To Whom It May Concern:

The Casita Coalition is a State-wide coalition with a mission of promoting small, energy-efficient, naturally affordable, inclusive, and equitable housing forms in every neighborhood. We are actively involved in removing barriers to Accessory Dwelling Units (ADUs), including regulatory, financial, and cost barriers.

We are commenting on the 2022 Code Cycle upgrades and are requesting adjustments to the State-wide analysis and implementation of the Code Cycle. Current energy analysis focuses on homes that are 2,100 and 2,700 square feet (sf). These homes are built differently, cost more per occupant for life-cycle imbedded building and energy costs than small homes that are typically under 1,000 square feet. The initial imbedded energy to build small housing is less. The ongoing cost to heat and cool small homes is less. The cost of energy in furnishing and maintaining a small house is less. The cost of adding density to existing developed neighborhoods is more energy-efficient than forcing development out into undeveloped areas.

The future of California is in small housing. Cost of housing construction in California exceeds the cost of construction anywhere else in the United States, forcing Californians into smaller new homes. The lack of housing sites in urban areas has necessitated State law changes to allow ADUs in every neighborhood in the State with just a building permit as the most economical, efficient, inclusive, and equitable housing form. ADUs improve housing choices for families and workers, in both price and location. Yet, our energy codes and modeling do not recognize the energy and carbon reduction of small homes, which are inherently more energy efficient than large homes and which create a much smaller carbon footprint. In fact, Accessory Dwelling Units and other small (under 1,000 square feet) housing forms cannot be reasonably priced or cost-effectively built under codes designed for 2,100 sf and 2,700 square foot homes.

continued



We recommend the following revisions for your consideration:

- 1) The Title 24 process demonstrates cost-effectiveness for 2,100 sf and 2,700 sf houses, but not for smaller homes or ADUs. We request that future code cycles make some provision to ensure cost-effectiveness in small dwelling units (1,000 sf or less).
- 2) PV requirements should be relaxed for small newly built units. The fixed costs of PV may make it not cost-effective for dwellings under a certain size, and small ADU roofs may not have the required solar orientation or size to make the expenditure worthwhile.
- 3) The standard prescriptive design calls for a High Performance Attic in many climate zones, which is very difficult in buildings with low-sloped attics and small footprints. Because ADUs are small and typically have flat roofs, they often cannot fit both roof and roof deck insulation. This standard should be relaxed for ADUs.
- 4) The standard prescriptive design calls for a Whole House Fan in many climate zones, which is not practical in small studio and 1BR sized ADUs. While Whole House Fans work well in a larger home, they provide little benefit to and cannot be easily accommodated in a small home.
- 5) Glazing is often above standard (20% of floor area) in ADUs just to meet egress requirements and to provide sufficient natural light. We suggest relaxing this prescriptive requirement primarily to allow small housing access to reasonable light and air while still meeting Title 24.

We would appreciate your feedback and continued dialog regarding the above recommendations. Please feel free to reach out to Debra Sanderson, debsanderson51@gmail.com, 510-812-8781 if you have any questions or request additional information, clarification, or documentation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Denise", with a long horizontal flourish extending to the right.

Denise Pinkston
Board Chair & Founder

A handwritten signature in blue ink, appearing to read "Debbie S.", with a small dot at the end.

Debra Sanderson
Board Secretary