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CBIA & CAA - 20-BSTD-02 Comments on CalGreen

Additional submitted attachment is included below.

June 14, 2024

Commissioner Andrew McAllister
California Energy Commission
Docket Unit, MS-4
715 P Street
Sacramento, California 95814

RE: **Docket No. 24-BSTD-02**
2025 Update to the California Green Building Standards
Comments by: **California Building Industry Association**
California Apartment Association

Dear Commissioner McAllister

Introduction

The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member companies involved in residential and light commercial construction. CBIA member companies are responsible for over 85% of the new single-family homes built in California annually.

The California Apartment Association is the largest statewide rental housing trade association in the country. It represents over 60,000 single-family and multifamily apartment owners and property managers responsible for over 2 million affordable and market rental units throughout California.

Background

During the June 5th Lead Commissioner Hearing, CEC Staff provided a detailed overview of the proposed changes to the California Green Building Standards Appendices A4.2 and A5.2. Included in this discussion were the proposed changes to the Requirements for Alterations to Existing Buildings, specifically the requirements that would be applied when the owner of a single-family dwelling replaces an old air conditioner (Part 11, Section A4.204.1.1).

As indicated in our June 5th testimony, we supported the proposed change. Still, we suggested an editorial change consistent with other residential green building measures to reduce confusion in the field. For example, the Department of Housing and Community Development's mandatory measures for EV-Charging in apartments are formatted as follows:

4.106.4.3 Electric vehicle charging for additions and alterations of parking facilities serving existing multifamily buildings.

Where new parking facilities are added.....

We would suggest the Energy Commission consider making a similar clarification to the following section title:

A4.204.1.1 Altered Space-Conditioning System **Serving Existing Single-Family Dwellings**
– Mechanical Cooling

This clarification of staff intent would avoid misapplication of this measure to other residential occupancies not intended by the Energy Commission.

We appreciate your consideration.