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To: CBSC@DGS
Subject: Request for Public Comments
Date: Tuesday, April 21, 2026 6:09:52 PM

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Dear Commissioners and HCD Staff,

I respectfully submit this comment on the 2025 CALGreen Intervening Code Cycle, requesting the creation of a Rural Small Efficiency Unit (RSEU) pathway within Title 24.

Problem

In rural California counties, the cost to construct even very small housing units often exceeds \$300,000–\$400,000, making legal housing unattainable for many landowners and workers.

At the same time, California law already recognizes efficiency units as small as 150 square feet, yet there is no practical, cost-effective regulatory pathway to build such units under a simplified standard.

The result is a gap between what is legally allowed and what is realistically buildable.

Proposed Solution

Establish a new classification:

Rural Small Efficiency Unit (RSEU)

A performance-based housing category for:

- Rural parcels (e.g., outside urban service areas or larger parcels)
- Low-occupancy use (1–2 persons)
- Small structures (150–500 square feet)

Core Framework

1. Maintain Essential Safety

RSEUs should meet fundamental health and safety requirements:

- Structural stability
- Wildland-Urban Interface (WUI) fire safety and defensible space
- Weather protection and moisture control

- Minimum ventilation standards
- Smoke and carbon monoxide alarms
- Emergency egress (door and rescue opening)
- Safe electrical and plumbing systems
- Potable water supply (or approved alternative)

2. Use Performance-Based Compliance

Allow compliance through simplified performance standards rather than complex prescriptive requirements.

This approach is appropriate because:

- Small structures inherently have lower risk profiles
- Energy and resource use are naturally minimized due to size
- Simpler designs reduce construction errors and cost

3. Reduce Cost Drivers

RSEUs should allow:

- Simplified structural design pathways for small spans
- Reduced or simplified energy compliance requirements for sub-500 sq ft units
- Elimination of unnecessary mechanical system requirements
- Pre-approved plan sets and standard details
- Owner-builder construction

4. Streamline Permitting

- Ministerial (non-discretionary) approval
- Reduced permit fees for small units
- Simplified inspection checklists appropriate to scale

5. Avoid Disproportionate Requirements

For sub-500 sq ft rural units, avoid requirements that significantly increase cost without proportional benefit, including:

- Mandatory electric vehicle charging infrastructure

Mandatory photovoltaic systems

- Complex energy modeling requirements

These features may be encouraged but should not be required for this category.

Benefits

Affordability

Creates a realistic pathway for small, legal housing in the \$25,000–\$75,000 range, rather than \$300,000+.

Sustainability

- Smaller homes reduce material use and embodied carbon
- Lower energy and water demand
- Minimal land disturbance

Wildfire Safety

Encourages compliant, fire-safe construction rather than unregulated alternatives.

Rural Housing Supply

Supports workforce housing, caretaker housing, and owner occupancy in rural areas.

Request

I respectfully request that HCD and the Commission:

1. Develop and adopt a Rural Small Efficiency Unit (RSEU) pathway
2. Incorporate performance-based compliance options into CALGreen
3. Provide model code language for local adoption
4. Reduce regulatory barriers that make small rural housing economically infeasible

Conclusion

California already permits very small efficiency units in principle, but the current regulatory structure prevents them from being built affordably.

A Rural Small Efficiency Unit pathway would align regulation with reality—allowing safe, simple, and sustainable housing that is economically achievable.

Thank you for your consideration.

Sincerely,

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Sent from my iPhone