



Date: May 27, 2015

To: Secretary Marybel Batjer, Chair
Members, Building Standards Commission
Jim McGowan, CBSC Executive Director

From: California Building Industry Association	NAIOP of California, the Commercial Real Estate Assn
California Business Properties Association	International Council of Shopping Centers
Building Owners & Managers Assn. of CA	California Retailers Association
California Chamber of Commerce	California Apartment Association
California Landscape Contractors Association	American Institute of Architects California Council

RE: SUPPORT: BSC & HCD Emergency Building Standards (Landscape Water Conservation) (BSC EF 01/15) and (HCD EF 01/15) California Green Building Standards {Title 24, Part 11}

The above listed organizations are pleased to inform you that we strongly support adoption of the proposed emergency amendments to the California Green Building Standards as proposed by the Building Standards Commission (for commercial construction) and the Department of Housing & Community Development (for residential construction). This support relates to the proposed emergency changes contained in the express terms issued on:

- May 8, 2015 by the Department of Housing & Community Development (HCD-EF-01-15)
- May 11, 2015 by the Building Standards Commission (BSC-EF-01-15)

These emergency building standards will apply to residential and commercial construction for which the permit application is submitted to the local building department on or after June 1, 2015. This emergency action was prompted by the Governor's recent Executive Order on the drought emergency and subsequent rules issued by the State Water Resources Control Board.

Among other things, these emergency building standards will require the calculation of a water budget for the site using a modified version of the Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELo). This is the water budget calculation tool that has been required in most local jurisdictions for the past five years. If properly implemented at the local level, the modified tool will result in a 20%-25% reduction in landscape water consumption.

Both HCD and BSC staffs should be commended for all the work that has gone into the fast-track development of these emergency regulations. Industry will work with BSC, HCD, DWR and the California Building Officials (CALBO) in the effective implementation of these building standards throughout the state and we strongly support the adoption of both of these regulatory packages at the BSC's hearing scheduled for Friday, May 29th, 2015.