

R-17

10-21-08



October 21, 2008

Honorable Mayor and City Council  
333 W. Ocean Blvd  
Long Beach, CA 90802

**RE: PROPOSED GREEN BUILDING PROGRAM FOR PRIVATE DEVELOPMENT**

Dear Mayor Foster and Members of the City Council:

On behalf of the over 650 companies and their representative employees who make up the Los Angeles/Ventura Chapter of the Building Industry Association of Southern California (BIA), thank you for the opportunity to comment on the proposed Green Building Program for Private Development which would establish new standards for sustainability for construction in Long Beach.

We appreciate the city's efforts in developing a tiered system that includes a combination of basic mandatory requirements, thresholds, and incentives for builders that go above and beyond the minimum requirements.

Since Long Beach is considering making an interim requirement final, we'd like you to reconsider the reliance on LEED as a third party certification system. Doing so places the responsibility for setting standards and codes out of the public process and out of a local process. We've seen many jurisdictions, most recently LA County, that have seen the risks in this approach. LEED is also currently updating their program (LEED 2009) and it's important that the city's program include language that recognizes and prepares for future changes, so that those that strive to meet the LEED certification levels know which version of the program is acceptable to the city.

In addition, since this was last brought forward, the State of California has developed green building standards which start phasing in during 2009, and the energy requirements in July of 2009. The State's Codes were developed to bring consistency to California's cities. Long Beach should consider whether the program will work with, or be in conflict with, those new state codes.

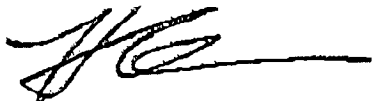
**"Building Homes ... Building Communities"**

We'd also urge the city to use caution when considering lowering thresholds even more than what's detailed in Tier 2 of the program at this early stage. As many cities move towards "greening" new construction at a rapid pace, the results of new green building ordinances are not quantifiable. The Long Beach program and the new state codes should be allowed to take effect and proven to work before the city makes changes to the program.

The program mentions that additional threshold levels could be added, such as applying the requirements to reuse/rehabilitation projects valued at equal to or greater than 50% of the existing building. The BIA has long been a supporter of improvements in technology that make construction more energy efficient and protective of the environment. In fact, homes built in California are some of the most energy efficient structures constructed in the world. With new home construction constituting less than 1% of buildings we hope the City considers pursuing programs that rehabilitate older homes. Today's homes are the most energy efficient houses ever built, and no measurable environmental gain can be achieved by regulating a mere 1% of the housing stock. Any program should include incentives for the rehabilitation of existing buildings if it is to produce the environmental results the City says it wants.

Thank you once again for the opportunity to provide comments, and we look forward to working with you when an ordinance is finalized. Please feel free to contact me at 661-257-5041 or [hschroeder@bialav.org](mailto:hschroeder@bialav.org) if you have any questions or comments.

Sincerely,



Holly Schroeder  
Chief Executive Officer