



*Inspiring a more sustainable San Carlos*

Chris Valley, Building Official  
City of San Carlos  
600 Elm St  
San Carlos, CA 94070

Re: Comments on 7/22/2010 draft Green Building Ordinance

Dear Mr. Valley,

Thank you for the opportunity to comment on the Building Department's draft Green Building Ordinance circulated by e-mail on July 22, 2010. While we are pleased that the City is proceeding with developing a green building ordinance, we are concerned that each successive outline and draft that we have seen has been weaker than the one before it.

At the first stakeholder meeting hosted by the Building Department, the Department proposed as an initial approach a matrix of compliance levels including LEED Silver certification for new commercial construction 10,000 s.f. or larger, 75 GreenPoints (as verified by the Department) for new single-family homes and reconstruction, and 50 GreenPoints (verified by the Department) for residential additions over 500 s.f. By the second meeting, the Department had abandoned the LEED and GreenPoint proposal and instead proposed instead requiring compliance with CalGreen Tier 1, which includes a requirement that the building be 15% better than basic Title 24 energy requirements.

The draft that has been circulated, however, ***completely abandons any green building requirements other than the requirement that projects of a certain size be at least 15% more energy efficient than Title 24 currently requires.***

Although the draft at Section 15.04.125 C adopts several CalGreen sections as mandatory, two of the sections are the requirement that new construction be 15% more efficient than the Title 24 minimum (§A4.203.1 and §A5.203.1.1), four sections are simply statements that local governments can make necessary changes to the code provisions (§§ A4.213.1, A4.306, A4.411.1, and A4.509.1), and two of the sections are actually blank (§§A4.204 and A4.503). Although in the last meeting we were told that it would, the draft **does not** adopt as mandatory CalGreen Tier 1 (§§A4.601.4.2 and A5.601.2.4). Sections 15.04.125 E and F in their descriptions of "mandatory standards for green building compliance" **only require projects exceed Title 24 by 15%.**

Although the draft includes definitions that make reference to Tier 1, LEED, and the GreenPoint Rating system, as currently drafted there is no requirement that



any project of any size meet the requirements of CalGreen Tier 1, LEED, or GreenPoint.

The elimination of all green building requirements other than the increased energy efficiency and the small number of measures that are mandated by the CalGreen code runs directly counter to the directions from the City Council. This draft does not require or even encourage any measures other than the increased energy efficiency modeling, and does not come anywhere close to being comparable to the green building ordinances enacted by our neighboring municipalities.

We request that you return to the proposal you began with, requiring projects of a sufficient size to comply with robust, flexible, and field-tested green building programs such as LEED and GreenPoint. We also encourage you to circulate an updated draft well in advance of the upcoming City Council meeting at which you intend to propose adoption of this ordinance.

Sincerely,

**San Carlos Green**

By: Suzanne Henderson Emerson, San Carlos resident  
Julie Willard, San Carlos resident  
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cc: Mayor Randy Royce  
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Council Member Matt Grocott  
Council Member Bob Grassilli  
Council Member Andy Klein