



November 13, 2009

David Walls, Executive Director
CA Building Standards Commission
2525 Natomas Park Drive, Suite #130
Sacramento, CA 95833

Re: California Building Standards Commission Express Terms for Voluntary Concrete Provisions for the 2010 CGBSC dated 10-01-09 (sections A5.405.5 – A5.405.5.3.2.3)

Dear Mr. Walls:

The California Nevada Cement Association (CNCA) thanks you and your office for their efforts to address concerns with regard to the originally proposed amendments for the concrete and cement provisions to the California Green Building Code. CNCA members include all cement producing companies in California and Nevada. The association is dedicated to providing technical review and recommendations of statewide standards affecting cement and concrete materials and applications.

CNCA appreciates the recognition of additional means of compliance in Section A5.405.5.3 for environmentally significant innovations in cement production. Inclusion of verbiage for alternative fuels, alternative power and alternative ingredients signal a recognition of important updates in standards and innovative solutions. We will commit to helping the Building Standards Commission to develop these topics in further detail in future editions of this standard.

We offer these additional comments and recommendations:

- 1) **A5.405.5.1 Cement.** Item Number 2 reads "Blended Cement shall meet ASTM C 595, Standard Specification for Hydraulic Cement." We believe this should read as "Standard Specification for *Blended* Hydraulic Cement."
- 2) **A5.405.5.2.1 Supplementary cementitious materials (SCM).** We greatly appreciate that specific reference to Caltrans specifications has been removed for fly ash, slag, and pozzolans (A5.405.2.1). As we mentioned in prior discussions, we had several concerns with specifically citing Caltrans specifications: the considerable differences between paving and building specifications, particularly paving specifications for a particular organization within a general building code; the newness and untested nature of the Caltrans specifications; and the unfamiliarity of the Caltrans specifications to structural engineers, architects, and other users in the building construction industry.

One concern is that the proposed code language says to follow ASTM standards "....and the Caltrans specification." Such a construction would be problematic in most applications. At the least, the sentence should be changed to say, in effect, "ASTM or" A preferred approach is to reference ASTM standards only, which are already familiar standards to the building design community and easy to reference.

Recommendation: For A5.405.5.2.1.2 and A5.405.5.2.1.3, remove Caltrans specification references or change “and” to “or.”

- 3) **A5.405.5.2.1.1 Mix Design Equation.** While Section A5.405.5.2 above includes a provision to allow discretion by an engineer and while the Mix Design Equation section also includes an exception for engineer discretion for high early strength concrete, we recommend one change to ensure the engineer has sufficient discretion in all potential instances (*changes in italics*).

Recommendation: Exception: Minimums for concrete products requiring high early strength *or other special architectural or design consideration* may be lower as directed by the engineer

- 4) **Industry ‘Sustainability’ Proposal.** We also greatly appreciate the consideration given by you and your office to the “sustainability” proposal presented by industry. We realize the sustainability proposal was a significant one, and that there was not sufficient time to explore all its ramifications and provide detailed examples. However, we are hopeful the Board will give it serious consideration in the next round of code updates.

Recommendation: We encourage the Commission to consider the sustainability proposal in the next round of code development. We would commit to participate in such a process, and believe it should include a broad array of stakeholders, including concrete, cement, architectural, and structural engineering representatives.

Again, we appreciated the opportunity to work with you and your personnel the past several months. We look forward to participating in advisory and other working groups as the next cycle of Green Building Code development begins.

Sincerely,



Thomas Tietz
Executive Director

Cc: Bob Raymer – Chair, Green Building Advisory Committee