

November 13, 2009

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

Re: Concrete and Cement Amendments to the  
California Green Building Code

Dear Mr. Walls:

On behalf of PCMAC, the Precast/Prestressed Concrete Manufacturers Association of California, we appreciate your working with our Association, the last few months, for the betterment of California though we were disappointed in the final "Draft Code" that the Commission put out for comment.

PCMAC and its Member Companies take pride in the sustainable attributes of our plants and the products we produce. These products range from California bridge girders, to building structural systems to architectural precast cladding. We are moving into the highway pavement market and have produced prestressed concrete piling for a number of years. We and our employees have a major investment in California and take our civic responsibility seriously. To that end I hope we can work together in the coming year to develop a meaningful California Green Building Code during the next Code cycle.

Specifically we do not see supplementary cementitious material, or SCMs, as the only solution but only as one component of a green and sustainable building code. We also work in both the building and transportation markets and find little commonality between the two and therefore feel they should be kept separate, at least with respect to Code references. In conclusion any green or sustainable building code should be looked at holistically and the end results, rather than the means and methods, be codified. For example, the code should take into account not only the green attributes of a material, but where and how is it shipped, and does that material, with shipping included, still out-perform locally available materials that might not be considered as green.

We again offer our Association services when and if we can be of assistance.

Sincerely,

Douglas M. Mooradian, AIA, LEED AP  
Executive Director, PCMAC

