



California Timberlands Division

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May 11, 2011

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

VIA Email: CBSC@dgs.ca.gov.

Re: Comments on Proposed Rule Amending the 2010 Green Building
Standards Code – CCR Title 24, Part 11

RECEIVED
2011 MAY 16 P 3:48
CALIFORNIA BUILDING
STANDARDS COMMISSION

Dear Mr. Walls:

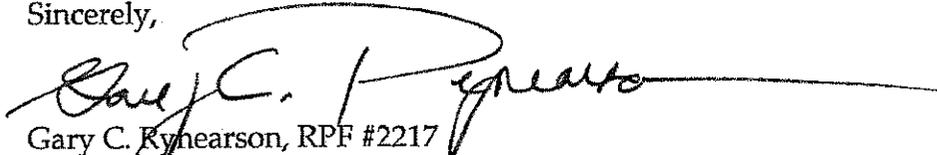
Thank you for the opportunity to comment on the proposed rule amendments. Green Diamond Resource Company owns timberlands in Humboldt, Del Norte, and Trinity Counties, and our sister organization, The California Redwood Company, operates lumber manufacturing facilities near Eureka. We have been operating continuously in California since 1947 and support over 700 union, non-union, and contractor jobs.

We are fully supportive of requiring renewable materials to meet the objectives of the Green Building Standards Code. Wood is a renewable building product that uses less energy to produce and has a much smaller carbon footprint compared to other building materials. We also support the use of recycled materials; however, we believe the recycled materials requirement should not apply to the structural components of a building.

We are also concerned about the "rapidly renewable" provision of the regulation. These materials are not native to California and often originate from overseas where native forests were converted to grow these crops. We support the use of California-grown renewable products, such as our lumber products.

We have reviewed the letter dated May 9, 2011 submitted by Sierra Pacific Industries. We concur with their comments and recommendations and would respectfully request their suggested changes be considered by the Commission.

Sincerely,



Gary C. Rynearson, RPF #2217
Manager, Forest Policy and Sustainability