



Sierra Pacific Industries

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June 25, 2011

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

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

Dear Mr. Walls:

These are the comments of Sierra Pacific Industries (SPI) on the Department of Housing and Community Development's (HCD) proposed amendments to the California Green Building Standards Code (*Cal Green*). Our comments are limited to Sections A4.405.3 – Recycled content and renewable materials, A4.405.3 Recycled Content, and A4.405.4 – Use of building materials from rapidly renewable sources. These provisions are applicable under Tier 1 and Tier 2 voluntary measures adopted and enforced at the local level. We also filed comments during the initial 45-day review period in May.

Our comments are based on HCD's proposed changes to the code. However, we urge that all agencies adopting the California Green Building Standards Code should incorporate these suggested changes. That would result in consistent application for the Building Standards Commission, HCD, Office of Statewide Health Planning & Development, and Division of State Architect.

General

We support the proposed change to the Recycled content provision. The amended code section limits the requirement for recycled products to just the non-structural elements of a building. This allows ample opportunity for renewable wood products to be used as structural components such as wall studs, plates, sills, beams, and trusses. By providing a path for renewable

building products in the Tiers, the *Cal Green* code will offer builders an alternative that meets the state's overall green building objectives while helping to secure jobs in California's forest products industry.

Section A4.405.4 – Use of building materials from rapidly renewable sources

We strongly object to this provision. Rapidly renewable materials are those grown within a 10-year or shorter cycle. These are typically plants such as bamboo, cork, wheat straw, and kenaf that are commonly grown overseas and shipped to the United States. They are not grown in any significant quantity in California, and are inferior to solid wood from both a structural and environmental standpoint. In recognition of this fact, the U.S. Green Building Council is proposing to drop the rapidly-renewable point from its 2012 LEED rating system.

In California it is unlawful to harvest a stand of native trees on timberland and replant with non-native short rotation crops such as those described above. The state's rigorous forest practice regulations prohibit this type of substitution, and also require that trees be grown for 50-80 years before harvest. Clearly, the rapidly renewable provision is at odds with both of these requirements. The only feasible way that rapidly renewable materials could be planted on timberland is if the state approved a conversion of the land use. Conversions are frowned upon by the state because they remove acreage from the timberland base that provides wood products, wildlife habitat, clean water, carbon sequestration, and other benefits not found with the growing of short-rotation crops.

In addition, farmland in California is much more valuable for food crops than for short-rotation building materials. Thus, farm owners are highly unlikely to convert their lands to such crops. By including Section A4.405.4 in the *Cal Green* code, the state would be encouraging the import of materials from overseas with the attendant carbon emissions associated with transportation and the uncertainty of the conditions under which these crops were grown and harvested. We urge the BSC to drop this provision in its entirety.

Further, it is unclear how rapidly renewable products should be used, or what the minimum threshold is under this provision.

We appreciate the opportunity to comment on these proposed changes to the Cal Green building code, and would be pleased to answer any questions that you might have.

Sincerely,

A handwritten signature in blue ink that reads "Mark Pawlicki". The signature is written in a cursive style with a large initial 'M'.

Mark Pawlicki
Director, Corporate Affairs and Sustainability

cc: Doug Hensel, HCD