

MEMORANDUM



To: Dr. Joseph Cassmassi, SCAQMD
RE: EGM-01 Comments
From: Walker Wells, Global Green USA
Date: 12/10/06

Background

Global Green USA appreciates the opportunity to participate in the process of the developing recommendations for effective ways to address air quality impacts related construction and redevelopment in SCAQMD jurisdiction. Over the past ten years Global Green has established itself as a leader in the region and nationally in green building, renewable energy, and urban sustainability.

The comments provided below are based on our organizations experience working with local governments in Southern California to develop green building programs targeted at private-sector residential and commercial development. Many of these programs are administered in conjunction with the local planning and building entitlement and building permit review processes. What makes green building programs unique in terms of public agency administered programs is that they offer a great deal of flexibility. Rather than identify how to mitigate a negative impact, effective green building programs encouraging creative thinking and the proactive incorporation of environmentally beneficial strategies. We hope that the approach taken for EGM-01 has a similar spirit and effect.

Recommended Goal of EGM-01

EGM-01 should provide clear direction to those involved in development projects about air quality related requirements that will impact the design of the homes and communities. By providing clear direction, developers can, in a proactive fashion, incorporate design strategies into the design that will reduce air quality impacts, and result in compliance with the standard.

Many local jurisdictions (Pasadena, Irvine, Mission Viejo, Santa Monica) have established green building programs. The California BIA has also developed the California Green Building Program. EGM-01 should build upon the initiative being taken by leading developers throughout the region to incorporate green strategies into site plans and building designs.

The proposed structure for EGM-01 is similar to the structure that many builders and local agencies have expressed as preferable, a clear and prescriptive approach.

By providing for a builder-selected group of items that is consistent with the credits of green building programs to gain exemption, the rule allows developers to leverage on-

going green building efforts, creates flexibility, and is easy to implement for both project designers and local agency staff.

To this end, EGM-01 should take a New Project Development Approach, in the form of a rule that addresses the following:

1. Establishes a tons/year maximum threshold
2. Creates corresponding compliance thresholds, in number of units or gross square feet of development.
3. Establishes strategies that can be employed to mitigate the expected air quality impacts. These would include actions that exceed current “background” assumptions in that they either surpass Title 24 code requirements, use current practices (such as landscaping) to provide additional benefits, or that deploy technologies that are market ready but not yet common.

Proposed Structure

A. Thresholds:

- a) Any project projected to emit over 1 ton/year of NOx, VOCs, PM10
- b) 25 housing units
- c) 10,000 gross square feet of commercial, office, or industrial space

B. Exemptions: Projects that incorporate at least four of the following in the design of the development are exempt:

1. Development density of greater than 7 units/net acre or a floor area ratio (FAR) of 2.0 or greater
2. Project boundary is within .25 mile of transit or at least 2 community services (shopping center, bank, pharmacy, school)
3. Exceed Title 24, Chapter 6, requirements by 10% or greater
4. Provide 1 tree for each 10 square feet of gross developed area
5. Photovoltaic panels that meet at least 20% of the project needs
6. Solar hot water heating system
7. Low-VOC interior and exterior paint
8. Light-colored roof
9. Light-colored paving for at least 50% of paved areas

C. In-Lieu Fee:

Projects that exceed the thresholds but do not or able to incorporate a sufficient number of the items listed above may pay a mitigation fee.

The fee is proposed to be approximately \$1,500/unit or \$1.25/sq. ft., to be consistent with the cost of incorporating the items listed above in section B.