

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



February 21, 2013

Dear Construction Codes Coordinating Board:

The Green Building Advisory Council (“GBAC”) would like to commend the Department of Consumer and Regulatory Affairs (“DCRA”) and the Construction Codes Coordinating Board (“CCCB”) for completing the epic task of updating the District’s current construction codes in such a short period of time. It is a laborious undertaking, and we thank you for your efforts.

In particular, we would like to thank the CCCB for embracing Mayor Gray’s directive to update the Energy Code, and to create a new Green Construction Code. These two codes will put the District in the vanguard of cities across the nation, and will help drive us towards the goals of the Mayor’s Sustainable DC initiative.

The GBAC is in favor of the proposed amendments to the model International Green Construction Code in general, and particularly appreciates the effort to allow for alternative compliance paths in the code. That said, the GBAC believes that, because the construction codes are supposed to set the “floor” for building performance, there should be minimum performance thresholds set for the alternative compliance paths allowed in the code such as LEED, Green Communities, or others. We recommend that the CCCB consider placing thresholds on the alternative compliance paths that ensure equivalent or higher levels of performance relative to the green code (e.g., a minimum of LEED-Silver, a total of 50 optional points under Green Communities, or National Green Building Standard-Silver). We also do not see the necessity of having the Green Building Act (“GBA”) listed as an alternative compliance path. Projects following the GBA would already need to receive LEED or Green Communities certification.

The GBAC is very much in favor of the District’s adoption of the Energy Code based on the 2012 International Energy Conservation Code (“IECC”). The 2012 IECC is the first code cycle that will drive toward the goals of the Architecture 2030 challenge and move all buildings towards high performance, deep energy efficiency, and eventually to net zero energy. These goals will be essential to help us meet the aggressive 20-year targets for energy efficiency and renewable energy in the Sustainable DC Plan.

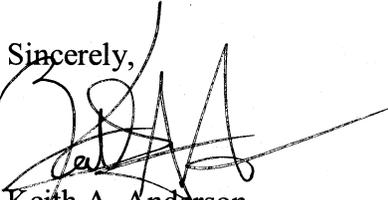
Of course, the most important element of any construction code comes after adoption. Without rigorous training and enforcement, codes become just words on paper. The GBAC urges DCRA to request all of the necessary staff support, and to pursue the highest level of code training for its staff and third party firms in order to fully enforce the codes and increase understanding of these code updates within the construction industry.

Now that the new Energy and Green Codes are moving to adoption, the GBAC would also request that we initiate a broader conversation about the interplay between the landmark Green Building Act of 2006, the new codes, and other green building related legislation and regulation in the city to make sure that all policies are aligned and moving the District in the best direction. The GBAC concurs with the efforts of the Green Technical Advisory Group and the CCCB to delete the sections of the model code that are already covered in regulation or legislation elsewhere in the District, but a larger conversation about the interplay of all of the various policies surrounding green building in the city would be very valuable.

Thank you again for the opportunity to comment, and for your dedicated effort to move the new codes towards adoption in 2013. Your commitment and support of the new Energy and Green Codes will have a significant and lasting impact on our buildings, the environment, and to the people of the District of Columbia. We sincerely hope that the commitment will continue into the 2015 code cycle and beyond.

Please contact DDOE staff member Bill Updike at 202-535-1337, or william.updike@dc.gov, if you have questions about the comments discussed above.

Sincerely,



Keith A. Anderson
Acting Director
District Department of the Environment