



Home Builders Association of Greater Springfield

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City of Springfield Council Members and City Planning Staff:

We appreciate your decision to table Council Bill No. 2007-315, the City's Green Building Policy, to allow further public comment and consideration of this policy and related issues. Green building is a critically important issue.

The HBA of Greater Springfield is the leading voice in our community regarding residential green building. Our association has adopted a comprehensive voluntary green building program that rates new homes and remodel projects in seven areas of green building, including lot preparation and design, resource efficiency, energy efficiency, water efficiency & conservation, occupancy comfort and indoor environmental quality, and operation maintenance and homeowner education. And we put our money where our mouth is: Our own new HBA office building is a green-built project that serves as an example and a practical demonstration to the building community of how to build green.

Our Green Building Steering Committee and Board of Directors have carefully reviewed the proposed city policy. After careful consideration, we are requesting that Section 6 of the resolution be removed for separate consideration and further discussion. This resolution serves the primary purpose of addressing the issue of publicly-funded buildings specifically commissioned by City government for its use. Placement of a section "encouraging" green building in private commercial and residential application is out of place in such a resolution.

If the City wishes to "encourage private residential and commercial developers to use green building design, construction and operation whenever feasible," this is a matter that should be addressed separately and with full participation and input from the industries most affected by prioritizing green building. Resolving to build public buildings to a LEED standard is a very different matter than delving into the issue of privately funded and owned projects like homes, offices, retail centers, etc.

Among other reasons to consider private construction projects separately is that Section 6 does not effectively define what would constitute "encouragement"—will it be encouraging words, incentives, new codes, new enforcement, or even new mandates? Left that broad, any current or future member of the staff and/or city council could interpret Section 6 any number of ways.

Without proper context, it is unclear what objectives the city seeks to achieve by including the vague reference in Section 6. For instance, what are the priorities in terms of the diverse array of issues that green building can potentially address (health issues, environmental impact/carbon footprint, sustainability, energy efficiency, etc.)? This is pertinent because different certification programs often have differing emphases. For example, if the primary objective is energy efficiency, then ENERGY STAR certification is the most appropriate certification program. If the goal is to emphasize recycling or emissions reductions, another certification may be more appropriate.

'Building Better Tomorrows'

An issue this important deserves research and real input from those who potentially are most affected. If the goal is to reduce our community's energy use and achieve the savings associated with that, the HBA would welcome the opportunity to partner in performing an analysis of where the greatest energy inefficiencies exist in our community. Typically, these inefficiencies are found in older buildings. A home built today generally performs about 70% more efficiently than a home built 35 years ago. There is only marginal benefit from making the small fraction of our overall housing stock represented by new construction just a little bit greener. There is far more potential in addressing the other 99% of the city's housing stock, which also happens to represent the least efficient housing units in our community. While it is certainly a nice idea to have something on paper that promotes green building for new construction—the real potential lies in encouraging homeowners to make changes in homes built before 1991.

According to a recent study by the National Association of Home Builders, the way to “green” 120 million existing homes is to remodel for energy efficiency. And remodelers are doing an outstanding job improving the performance of homes--85% of remodelers already use low-energy windows in their projects, 68% used insulated exterior doors, 65% upgraded insulation, and 56 % installed high efficiency HVAC. City Utilities, recognizing where the most ground can be gained, is planning to make ENERGY STAR certification more available to homeowners for remodeling and new construction projects by employing a certified ENERGY STAR inspector for just such purposes.

With regard to that smaller portion of our community's housing stock that is new construction, we would welcome the opportunity to work as partners toward what specifically might be done to encourage private residential builders and developers to use green building practices. Other communities, including our neighbors in Columbia and St. Louis, have used incentives successfully for residential and commercial building/development. We would be happy to provide research and documentation on “best practices” in other communities related to green building, and how communities have demonstrated the ability to get greener, faster.

This issue is important, and there is much work to be done if it is to be addressed properly. The HBA of Greater Springfield represents 425 local member companies that believe it is important to be included in the development of any public policy that affects their livelihoods. We believe the issue of private green building should be considered separately from the issue of taxpayer funded buildings owned by the city, because the matters are entirely different. Adopting Section 6 of this policy without drawing on the expertise of our members would not just be wrong, it would be a failure to utilize a willing and able resource in our community. We are asking for the opportunity to do this better, by asking council to remove section 6 from the resolution.

For the record, it is our position that public policymakers are painting themselves into a corner when they specifically select one national green building standard over another whether it is for commercial, residential or government buildings. That would only be a more precarious position if you also decide to mandate certification, as well. In our decision to build to a LEED silver standard for our new building in-fill project, we opted not to spend the additional \$15,000 to \$40,000 on certification because of our responsibility to our Association's members and the dollars they invest in this organization.

Our responsibility to our members is similar in many ways to your position as the stewards of taxpayer dollars. Ultimately, we made a decision similar to the one that the city is considering in the proposed resolution: build to the LEED standard, but protect the dollars entrusted to us by foregoing the costly LEED certification process. After all, those certification dollars do nothing to further enhance the

performance of the building. We understand and agree with the city's proposal in this regard, having been in a very similar position ourselves.

Also with taxpayers in mind, we believe a more prudent approach would be to broaden the definition to include other nationally recognized green building standards. Doing so would provide greater flexibility when it comes to cost factors and performance priorities. Green building is a rapidly evolving field in construction, and what is the best fit for the city today might not still be the best fit a couple of years from now. There may be future programs that could be even better than any of the ones we know of today. So why not provide as much flexibility for the city as possible?

There are a number of ramifications - including legal ones - associated with going down a path where the city goes on record as "endorsing" one green building program (especially in such a fast-changing environment) and not at least acknowledging others that are equally valid. The potential to get greener faster as a community is greater when a variety of good options are presented that are available, affordable, and competitive. The unintended consequence of the "LEED only" approach may be to bestow legitimacy on one green building program but, by their exclusion, to imply illegitimacy to all the other very legitimate green building programs which also provide 3rd party certification which isn't as costly and which doesn't financially benefit the licensing organization and the consultants who promote its use. What happens when building to LEED specification makes the project over budget, with or without certification? And, without some guiding priorities in terms of desired building performance, it would be quite possible for that over-budget building to be less energy efficient than an existing one. That hardly seems like an approach the average taxpayer will perceive as making wise use of their tax dollars.

In summary, the HBA of Greater Springfield is asking City Council to consider two important modifications to the proposed resolution before adopting it as city policy:

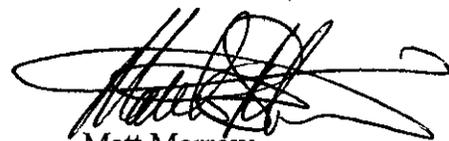
1. Broaden the definition of acceptable, nationally-recognized green building rating systems to include options beyond only the U.S. Green Building Council's proprietary LEED standard. Other options could include Energy Star, GBI Green Globes, the National Green Building Standard, and others that are of similar legitimacy, or will be in the future.
2. Remove Section 6 of the resolution entirely, referring it for further study to a group consisting of the leading green building construction professionals in our community (HBA, Springfield Contractors Association, etc.), City Utilities, and City of Springfield building officials.

Thank you for your willingness to address this important issue in our community. We look forward to the opportunity to work as partners toward the best possible solutions for all involved.

Sincerely,



Kevin Clingan
President, HBA Board of Directors



Matt Morrow
HBA Executive Officer