

## Green Standards

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Founded in 1908, Building Owners & Managers (BOMA) of Metropolitan Detroit is a professional trade association whose nearly 400 members either own or manage commercial real estate, or provide goods and services to the industry.

It is important to understand BOMA has a vested interest and supports sustainability and “green” building practices by utilizing proven technologies and operational procedures and by promoting environmental stewardship. We have long-recognized the social and economic burden that results from wasteful consumption particularly in the area of carbon-based utility costs. We take proactive positions on the use and management of natural resources, the proper treatment of hazardous waste and environmental risks, the promotion of air quality (indoor and outdoor), the implementation of “green” purchasing practices and in targeting the reduction of greenhouse gas emissions.

BOMA understands there are important environmental issues facing our country, as well as our state; we believe H.B. 4575 as proposed does not address Commercial Real Estate or residential concerns and would likely increase government administrative oversight and construction costs at a time when development should not be further hampered. Furthermore, model building codes are developed through a consensus process involving hundreds of interested parties, experts from the design community and construction industry, building regulators, and members of the residential and commercial real estate industry. The purpose of this deliberative process is to reach agreement on necessary change to model building codes that federal, state and local agencies can adopt and enforce for new building construction and renovation and remodeling of existing buildings. This process takes place under the auspices of the International Code Council (ICC), the American Society of Heating, Refrigeration and Air-Conditioning Engineers (ASHRAE), and other groups.

BOMA supports legislation that encourages voluntary participation in Green initiatives as well as financial incentives. BOMA does not support mandatory requirements.

Additional considerations:

1. ICC-700 is applicable to residential [single and multifamily homes] and has no application to commercial properties. However, ICC-700 was developed by the International Code Commissions working with the National Association of Home Builders and was endorsed according to the processes of the American National Standards Institute. Thus, the ICC-700 has passed through a recognized and well-developed procedure for drafting, reviewing, revising and issuing standards and recommendations.



2. The U.S. Green Building Council is a trade organization formed in 1993 to promote an agenda of sustainability. It is not a public organization. LEED is not a "standard", but a rating system and was developed by private individuals and contributing organizations with no real oversight or formal procedure allowing for review and comment.

3. The LEED Rating System was only developed beginning in 2000, and has not yet demonstrated an actual benefit to construction, sustainability or environmental concerns. In fact, some "green" buildings are claiming greater benefit than can be demonstrated. This is creating a new phenomenon of "greenwashing" by which someone touts a greater environmental value or rating than is measurable. While the development of standards is laudable, mandating requirements that are as yet unproven over time and are continuously being developed creates a dangerous moving target for commercial real estate. A LEED Rating System, while desirable, adds considerably to the cost of construction and is not always feasible.

4. Energy Star and similar government programs are more developed, defined and less volatile. However, they are not as comprehensive as the LEED Rating System, but they do provide a more stable framework from which to develop voluntary standards. Green Building Rating systems have been designed as voluntary systems and not to be implemented as mandatory requirements within a jurisdiction.

5. ASHRAE, also a trade organization, has developed over the years a technical and scientific arm that has participated in the creation of various government standards applicable to indoor air quality. In February 2010, ASHRAE, along with United States Green Building Council (USGBC) and Illuminating Engineering Society (IES) released The Green Standard 189.1, Standard for the Design of High-Performance Green Buildings Except for Low-rise Residential Buildings. It uses the widely respected ANSI consensus procedures.

**For more information on BOMA, its members or issue positions please contact:**

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