



**SPECIAL MEETING OF THE
CITY COUNCIL SUSTAINABILITY COMMITTEE
FOR DEVELOPMENT OF A
RESIDENTIAL ENERGY CONSERVATION ORDINANCE**

Hayward City Hall – Council Chamber
777 B Street, Hayward, CA 94541-5007

October 25, 2010

A G E N D A

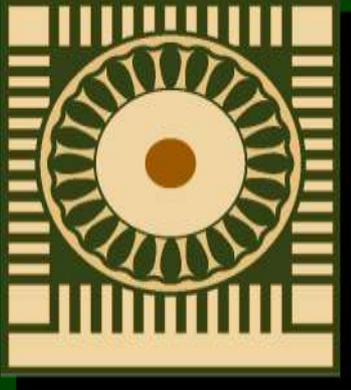
5:30 p.m. – 6:30 p.m.

Movie Screening: *The Next Frontier: Engineering the Golden Age of Green*

- I. Call to Order – 7:00 p.m.
- II. Roll Call
- III. Presentation by City Staff – Development of a Residential Energy Conservation Ordinance (RECO)
 - a. What is a RECO?
 - b. Why do we need a RECO?
 - c. Triggers
 - d. Possible Measures
 - e. Staff Recommendation
- IV. Presentation by PG&E – Incentives & Rebates Available
- V. Presentation by David Siddiqui – Home Energy Audits and Retrofits
- VI. Discussion – Public Comments and Responses from Staff and the Committee
(Speakers will be limited to 3 minutes each.)
- VII. Adjournment – by 9:00 p.m.



Assistance will be provided to those requiring accommodations for disabilities in compliance with the Americans with Disabilities Act of 1990. Please request the accommodation at least 48 hours in advance of the meeting by contacting Katy Ramirez at (510) 583-4234 or by calling the TDD line for those with speech and hearing disabilities at (510) 247-3340.



CITY OF
HAYWARD
HEART OF THE BAY

**Sustainability Committee Meeting
October 25, 2010**

**Residential Energy Conservation
Ordinance (RECO)**

Amelia Schmale, Sustainability Coordinator





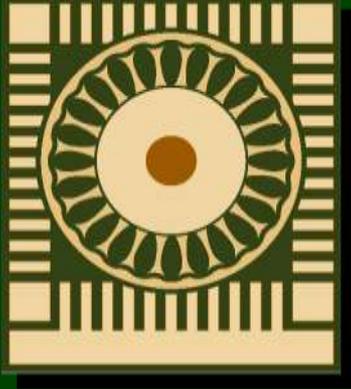
What is a RECO?



What is a RECO?

- A Residential Energy Conservation Ordinance (RECO) is a policy tool local governments can use to improve the energy efficiency of existing homes
- Property owners must demonstrate compliance with energy and water efficiency requirements
- Applied to single family, duplex and/or multi-family buildings





Why a RECO?



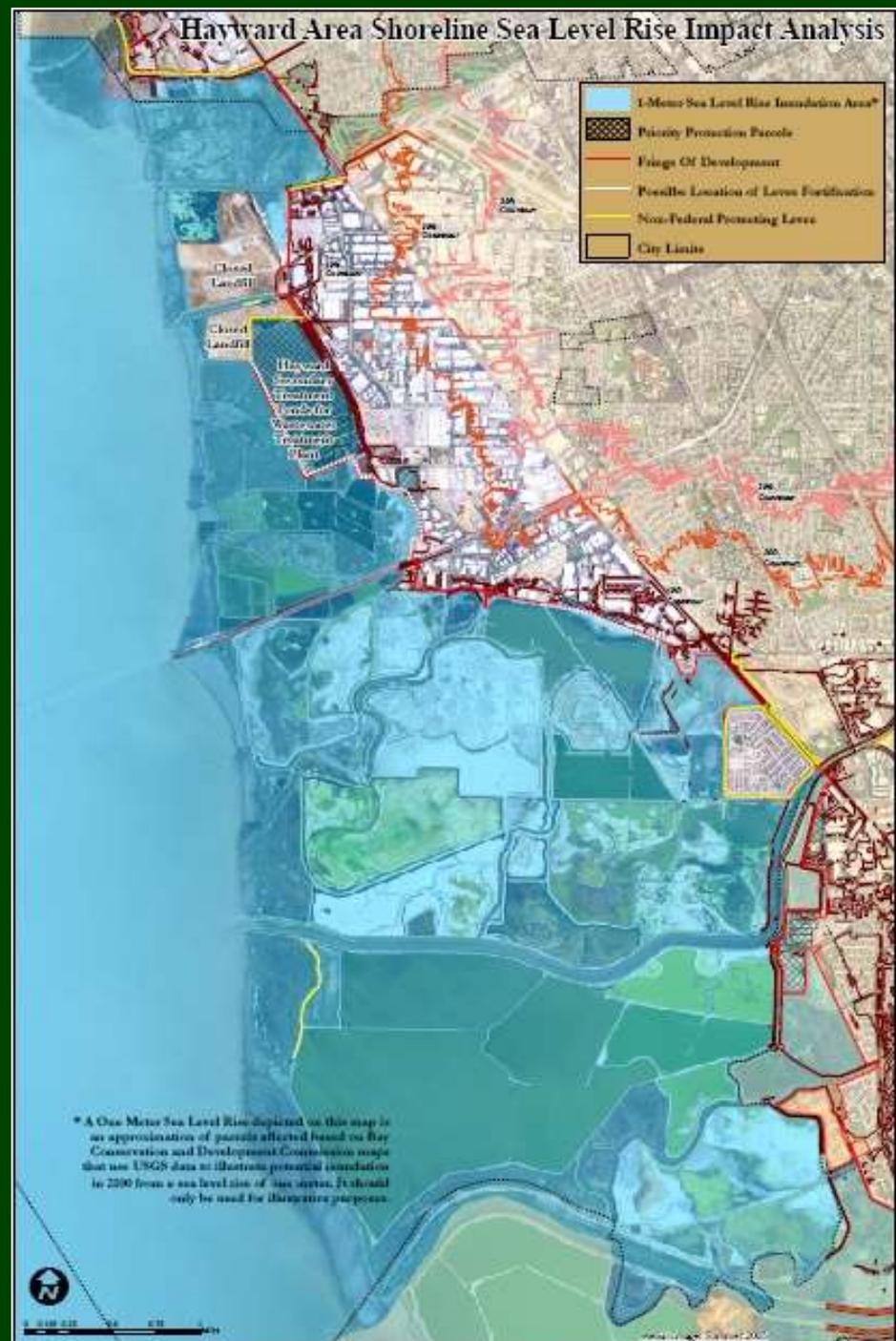
Why a RECO?

- Economic benefits: annual energy cost savings and job creation, increased home value
- Occupant benefits: improved comfort, indoor air quality and fire/combustion safety
- Environmental benefits: reduction in greenhouse gas (GHG) emissions, water conservation



Potential Sea Level Rise and Impacts on Hayward's Shoreline

(shows 55" rise by 2100)



Policy Context- State Goals

AB 32 The Global Warming Solutions Act

- Reduce GHG emissions to 1990 levels by 2020
- Reduce GHG emissions to 80% below 1990 levels by 2050

California Energy Commission- Long Term Energy Efficiency Strategic Plan

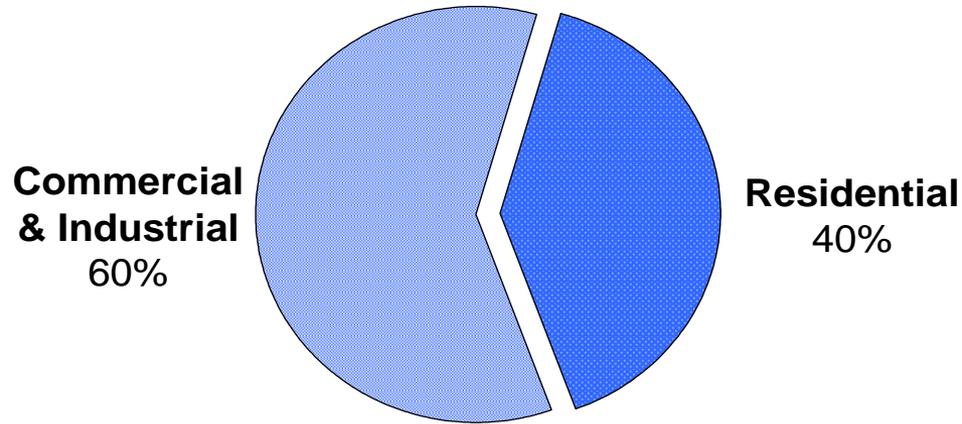
- Reduce energy consumption in existing homes by
 - 20% by 2015
 - 40% by 2020
- Recommends that local governments adopt RECOs

Hayward Climate Action Plan – Local Goals

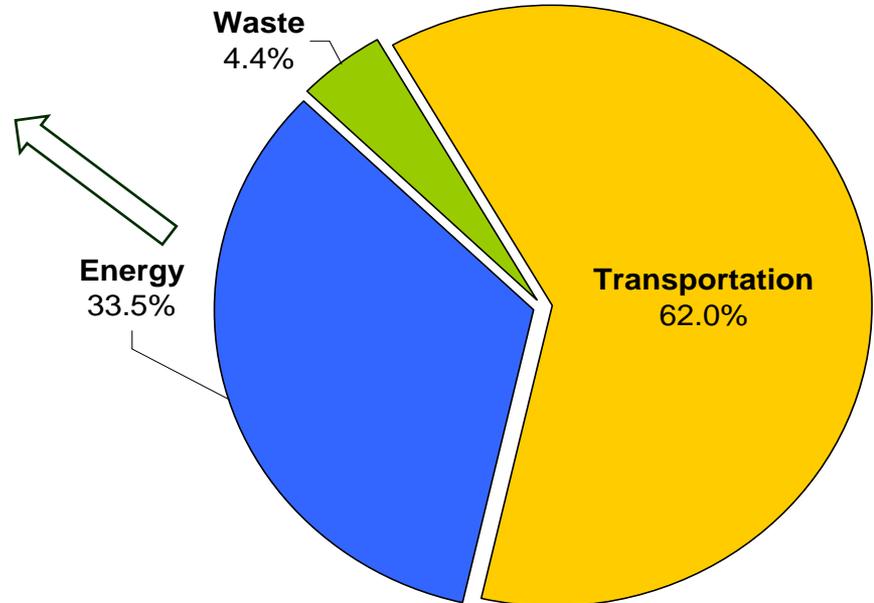
- Adopted by City Council on July 28, 2009
- Reduce Greenhouse Gas Emissions below 2005 levels by:
 - *12.5% by 2020*
 - *82.5% by 2050*
- Improve Energy Performance of Existing Buildings-
 - *reduce electricity consumption to 65% by 2050*
 - *reduce natural gas consumption to 50% by 2050*

GHG Emissions from Hayward's Buildings

Energy Emissions



Hayward City-Wide GHG Emissions - 2005
total emissions = 1.18 million metric tons CO₂e



CAP Community-wide Action Priorities

From Table 1, Hayward Climate Action Plan (CAP), 10/8/2009

Action #	Short Description	Estimated Annual Emissions Reductions (Metric Tons CO ₂ e)		Priority
		2020	2050	
3.9	Offer energy efficiency financing program for commercial buildings	1,630	132,025	1
3.3	Develop and implement Commercial Energy Conservation Ordinance	5,164	105,152	2
3.7	Energy efficiency financing program for single-family homes	181	40,248	3
3.8	Offer energy efficiency financing program for multiple-family homes	126	33,617	4
5.2	Offer renewable energy financing program for commercial buildings	10,768	22,822	5
6.3	Improve construction and demolition debris program	1,953	15,634	6
4.2	Continue to implement private development green building ordinance for commercial buildings	4,493	77,925	7
5.3	Add solar requirement into private development green building ordinance	2,980	24,660	8
4.1	Continue to implement private development green building ordinance for residential buildings	979	18,836	9
1.8	Prioritize traffic-flow management practices to reduce idling time	23,061	21,875	10
3.1	Develop and implement Residential Energy Conservation Ordinance for single-family homes	639	39,304	11
3.2	Develop and implement Residential Energy Conservation Ordinance for multiple-family homes	983	33,033	12
6.2	Increase participation in food-scrap collection programs	1,495	11,963	13
6.1	Increase participation in recycling programs	15,916	38,216	14
5.1	Offer renewable energy financing program for residential buildings	850	2,149	15



Timing of Top-Priority CAP Actions

Action Number	Short Description	Status	Priority
Action 3.9	offer energy efficiency financing program for commercial buildings	PACE	1
Action 3.3	develop and implement Commercial Energy Conservation Ordinance (CECO)	Early 2011	2
Action 3.7	energy efficiency financing program for single-family homes	PACE	3
Action 3.8	offer energy efficiency financing program for multiple-family homes	PACE	4
Action 5.2	offer renewable energy financing program for commercial buildings	PACE	5
Action 6.3	improve construction and demolition debris program	2011	6
Action 4.2	continue to implement private development green building ordinance for commercial bldgs.	Green Bldg. Ordinance	7
Action 5.3	add solar requirement into private development green building ordinance	2013	8
Action 4.1	continue to implement private development green building ordinance for residential bldgs.	Green Bldg. Ordinance	9
Action 1.8	prioritize traffic-flow management practices to reduce idling time	2015	10
Action 3.1	develop and implement Residential Energy Conservation Ordinance for single-family homes	In Development	11
Action 3.2	develop and implement Residential Energy Conservation Ordinance for multiple-family homes	2011/2012	12
Action 6.2	increase participation in food-scrap collection programs	ongoing	13

- Regional Property Assessed Clean Energy (PACE) is delayed pending Federal action
- Green Building Ordinance has been adopted
- Dates shown are per approved Implementation Timeline (Appendix E in CAP)



Hayward RECO Process

- July 28, 2009 – Climate Action Plan adopted by Council
- Feb 3, 2010 – Introduction of RECO to Sustainability Committee
- June 2, 2010 – Overview of RECO to Committee
- Summer 2010 – Cost Effectiveness Research
- August 11, 2010 – First RECO Public Meeting
- September 1, 2010 – Council Sustainability Committee Meeting
- October 20, 2010 – Climate Action Management Team Meeting
- October 25, 2010 – Special Sustainability Committee Meeting
- Early 2011 – Draft Ordinance to Council Sustainability Committee
- Spring 2011 – Draft Ordinance to City Council



News & Announcements

HAYWARD LIBRARY
CLOSED OCTOBER 21st
Staff Training Day

November 2, 2010
California General Election
MONDAY, OCTOBER 18, 2010 - TODAY!!
Last Day to Register to Vote in this Election
U.S. citizens 18 years or older are eligible to vote.
You must register to get on the official list of voters. You need to re-register if you move, change your name, or change your address.
TUESDAY, OCTOBER 26, 2010
Last Day for the Registrar of Voters to Receive your Written Request for a Vote by Mail Ballot.
If you have an Alameda County Vote by Mail ballot, you may drop off your ballot in the Office of the Registrar of Voters.
MORE »

STATE OF THE CITY
PRESENTATION » PDF
PRESENTATION » PPT

HAYWARD DEPARTMENT OF MOTOR VEHICLES
CLOSED UNTIL FURTHER NOTICE
LETTER »

Get Ready to S...
October 21, 2010

Southgate Neighborhood Meeting #2
October 18, 2010
ENGLISH NOTICE »
SPANISH NOTICE »

Residential Energy Conservation Ordinance
Special Meeting of the City Council Sustainability Committee on the development of a Residential Energy Co.
Monday, October 25th, from 7 to 9pm.
MORE »

Hayward Executive Airport
Request for Qualifications
Subur Creek Improvements
DOCUMENT »

Hayward Fire Department fights Apartment Fire
VIDEO »

Hayward Arts Council - "Holiday Members Show"
When: October 14 - December 17; Thursday - Saturday, 10 am to 4 pm
Where: Green Shutter Gallery, 2255 Main St., Hayward
FLYER »

Register To Vote

Disaster Preparedness

STOP GRAFFITI
Reward Hotline

GREEN HAYWARD

KHCG TASK FORCE

Water Conservation

Mural Art Program

CITY HALL
Business Hours
Monday - Friday 9:00AM - 5:00PM
Including Holidays
Saturday & Sunday CLOSED
Some City functions located in City Hall such as the Revenue Division and Development Services have modified hours. Information on specific hours of operation can be found on the [Link]

Res Ordina
Special Commit
Energy C
will meet
Chamber
9pm.
MORE »

Haywi
Requ
Sulph
Dr
Hayward Concept Design

HAYW (CPP)
Plans for Future Hayward Library

City Council Priorities and City Initiatives »

FY 2010-11 Positions & Salaries Schedule »

FY 2011 & 2012 Operating Budget »

Adopted FY 2010-2019 Ten-Year
Capital Improvement Program »

ABOUT HAYWARD
MAYOR & CITY COUNCIL
CITY COUNCIL MEETINGS
PLANNING COMMISSION MEETINGS
BOARDS, COMMISSION &
COMMITTEES
COUNCIL STANDING COMMITTEES

AIRPORT
CODES, ORDINANCES & FEES
DEPARTMENTS
EMPLOYMENT
LOCAL LINKS
VOLUNTEERING

BLOGS

City Clerk
City Manager
Climate Action Plan
Library News & Events
Mural Art Program
Refresh Your Life
TeenSpace



City Documents

ELECTIONS

Hayward Open For

Register To Vote

Disaster Preparedness

STOP GRAFFITI
Reward Hotline

GREEN HAYWARD

KHCG TASK FORCE

Water Conservation

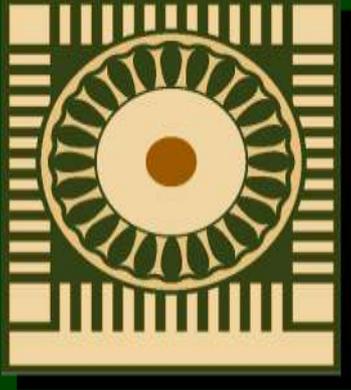
Mural Art Program



RECOs in Other Cities and Counties

- **Berkeley, CA**
- **Boulder, CO**
- **Burlington, VT**
- **Marin County, CA**
- **Palo Alto, CA**
- **Rohnert Park, CA**
- **San Francisco County, CA**

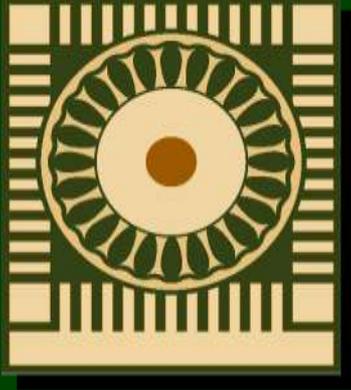




Ordinance Elements

- **Triggers**
- **Retrofit Measures**
- **Incentives**





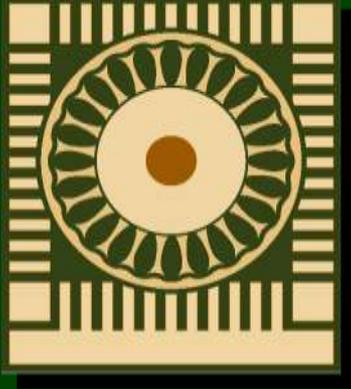
Triggers

- **Remodels**
- **Point of Sale**
- **Date Certain**



Trigger Options

- **Remodels > \$50,000:** RECO must be met as part of the regular permit process
- **Point of Sale/Time After Sale:** RECO must be met within a designated grace period (e.g., 1, 2 or 3 years) after property sale
- **Date Certain:** RECO must be met by a fixed deadline (e.g., 10 or 12 or 14 years after effective date)



Retrofit Measures

- Prescriptive approach
- Performance approach

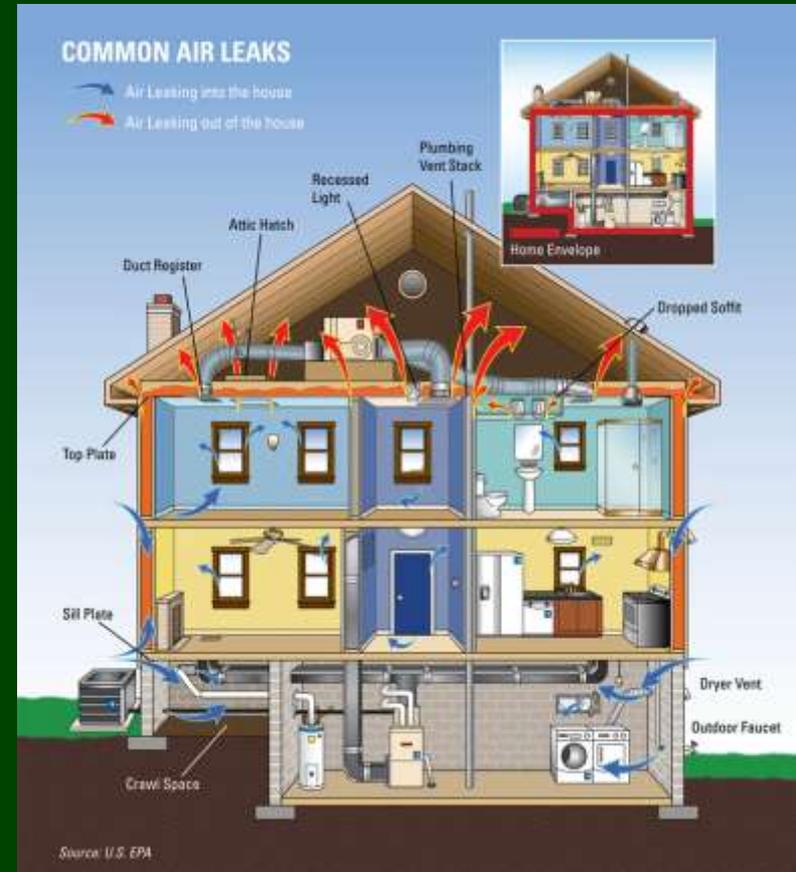


Prescriptive Approach

A checklist of specific retrofit measures

A basic prescriptive “Package” could include the following:

- Air sealing
- Attic insulation (quality installation)
- Floor insulation
- Duct testing and sealing
- Insulation of water heater and pipes
- Combustion safety and CO alarm
- New water heater
- *Loading order: must do air sealing before insulating*



Performance Approach

Evaluation of overall home energy use to produce customized retrofit recommendations

- Results in a report with an efficiency score
- Basis for eligibility for incentives/rebates and financing
- Higher level of accuracy when estimating potential energy savings
- Home is re-tested to measure actual efficiency improvements



Total Degree Days¹ of Selected U.S. Cities

City	Annual Heating Degree Days	Annual Cooling Degree Days	Annual Total Degree Days
Los Angeles	1,211	1,564	2,775
Hayward	2,817	509	3,326
Sacramento	3,121	1,468	4,589
Seattle	4,507	330	4,837
Miami	392	4,911	5,303
Houston	1,972	3,513	5,485
Palm Springs	1,165	4,442	5,607
Atlanta	3,630	2,332	5,962
Phoenix	1,181	4,836	6,017
New York	4,269	1,799	6,068
Washington, D.C.	3,955	2,216	6,171
Chicago	5,910	1,303	7,213
Denver	6,722	1,010	7,732
Omaha	6,607	1,515	8,122
Minneapolis	7,477	996	8,473
Truckee	9,207	353	9,560

Note 1: Degree Day is a unit of measurement equal to the difference of one degree between the mean outdoor temperature on a certain day and a reference temperature, in this case 65° F., which is used in estimating the energy needs for heating or cooling a building.

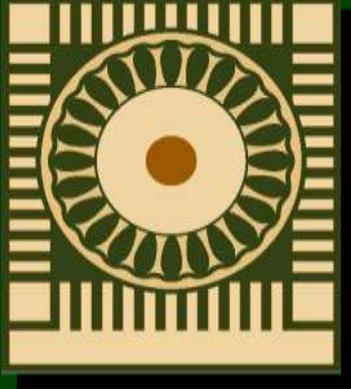
Retrofit Costs and Paybacks

(RECO Report, Executive Summary, Table 1)

<u>Energy Retrofit Measures</u>	Average Retrofit Cost (\$)	Average Payback with No Incentives (Years)	Net Retrofit Cost <u>with</u> Incentives (\$)	Average Payback <u>with</u> Incentives (Years)
Duct Sealing	\$1,029	27.8	\$415	11.2
R-30 Attic (from R-0)	\$1,178	24.6	\$1,028	21.5
R-38 Attic (from R-0)	\$1,319	27.0	\$1,169	23.9
Gas Water Heater EF=0.58	\$1,400	58.1	\$1,400	58.1
Air Sealing	\$1,411	33.9	\$706	16.9
Gas Water Heater EF=0.62	\$1,625	41.8	\$1,625	41.8
Air Sealing + Duct Sealing	\$2,440	31.0	\$1,220	15.5
Air Sealing + R-30 Attic (from R-0)	\$2,589	29.1	\$1,589	17.8
Air Sealing + R-30 Attic (from R-11)	\$2,589	43.0	\$1,589	26.4
Air Sealing + R-38 Attic (from R-0)	\$2,828	31.2	\$1,414	15.6
Air Sealing + R-19 Raised Floor	\$3,016	36.2	\$1,508	18.1
Air Sealing + R-30 Attic + Duct Sealing	\$3,617	31.1	\$1,809	15.6
Air Sealing + R-38 Attic + Duct Sealing	\$3,856	32.7	\$928	7.9

"with Incentives" include the combined PG&E and U.S. Home Star Prescriptive incentives





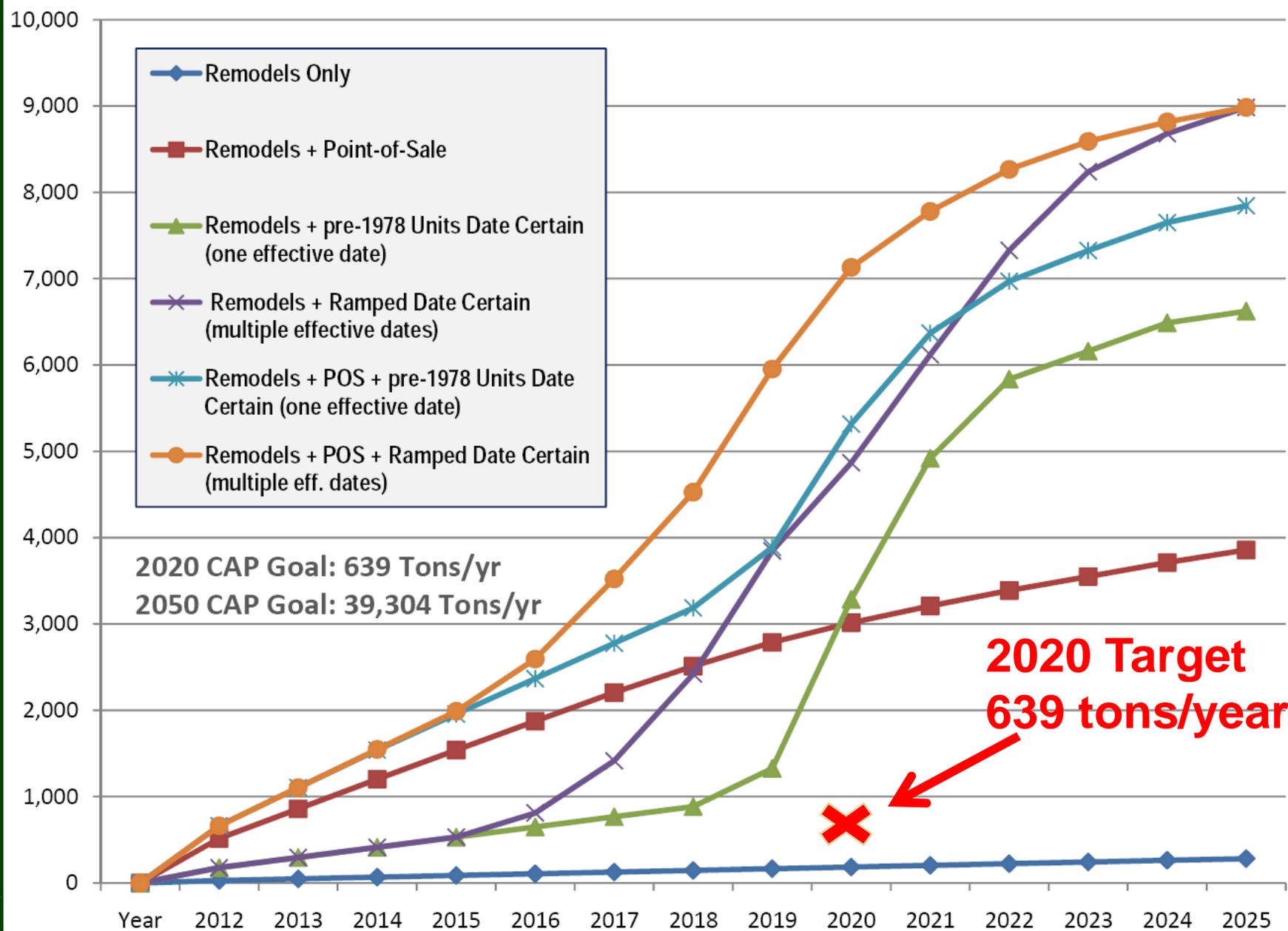
Potential for Energy Savings



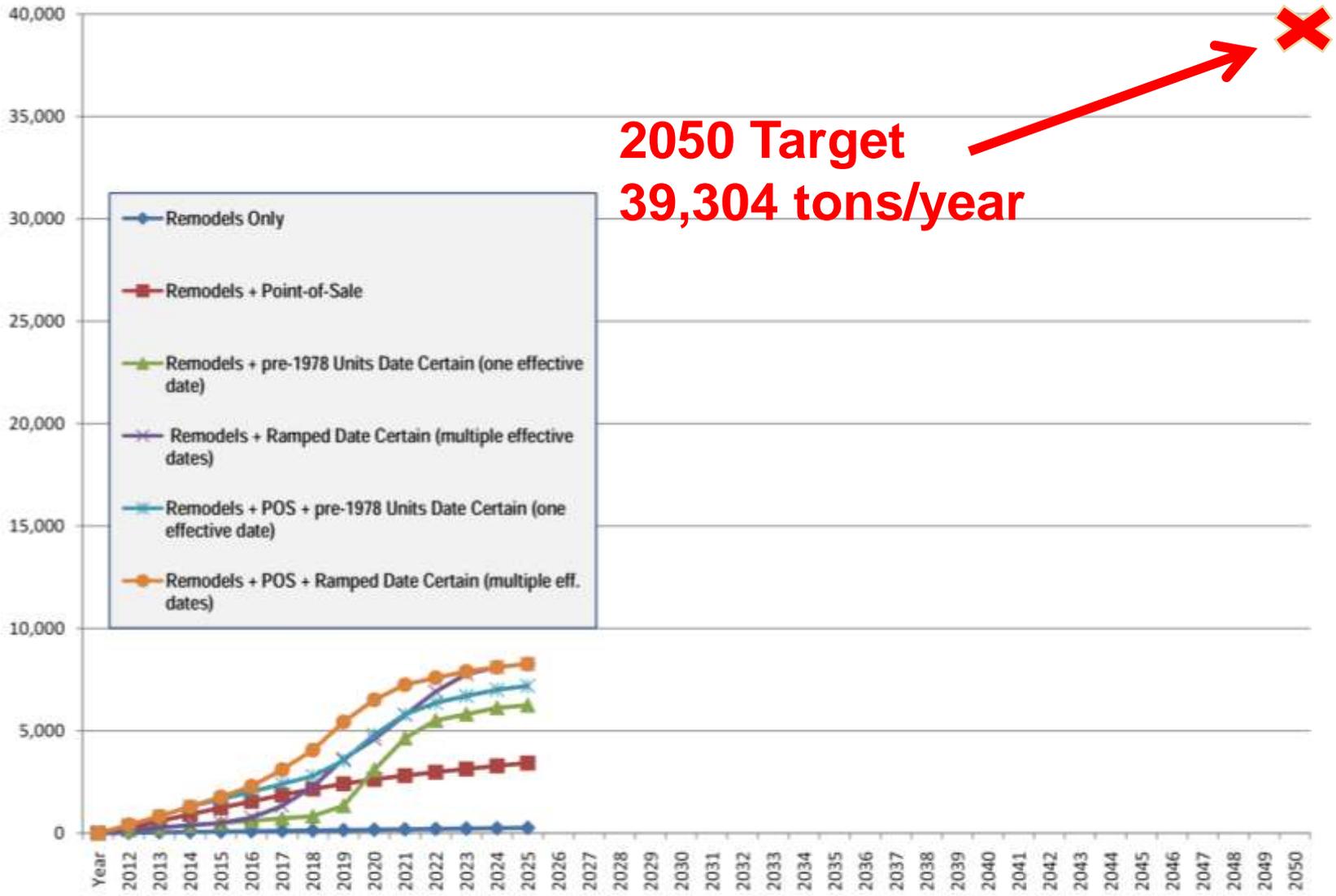
Potential Number of Homes Affected

- **Remodels > \$50,000:** 60 homes/yr based on recent Hayward data = 600 homes over 10 years or **2.1%** of all homes
- **Point of Sale/Time After Sale:** average of 1,000 homes/yr = 10,000 homes over 10 years or **34.3%** of all homes
- **Date Certain:** must be met by a fixed deadline for **100%** of all homes;
- **Date Certain:** For homes built before 1978 = **72%** of dwellings
- Possible exemptions (e.g., based on family income or disabilities) may alter number of homes affected

GHG Reductions by Trigger Type

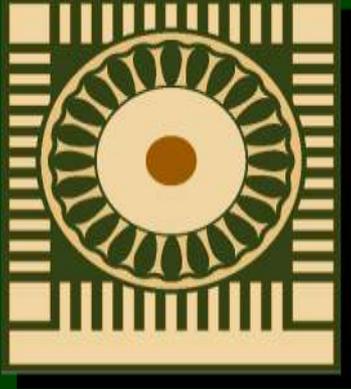


GHG Reductions by Trigger Type



2050 Target
39,304 tons/year





Incentives



Assistance

- U.S. HOME STAR Program
- Federal Tax Credits
- PG&E Rebates
- PG&E Energy Partners Program
- Energy Upgrade California
- EECBG-funded Audit Program



Federal Incentives

ENERGY STAR

- Insulation – Tax Credit: 30% of cost up to \$1,500
- <http://www.energystar.gov/>



U.S. HOME STAR Program

- Potential U.S. Home Star program incentives are pending approval of energy bill and funding of tax credits;
- Up to \$3,000 for prescriptive, up to \$8,000 for performance



Utility Incentives

- PG&E Residential Retrofit Incentive Program

Existing Rebates for Individual Measures

- \$150 for insulating > 1,000 sf attic
- \$100 for duct sealing
- Other rebates for new HVAC, appliances, etc.
- <http://www.pge.com/rebates/>



Prescriptive Package

- \$1,000 for attic air sealing, attic insulation, duct sealing, hot water pipe insulation, low-flow showerhead installation, combustion safety testing

Whole House Retrofits

- Performance audit, minimum % energy use reduction
- Up to \$3,500 for single family property owners



Utility Incentives

– PG&E Energy Partners Program

Free for Income Qualified Owners & Renters

- No-cost home energy improvements (house, apartment or mobile home)
- Attic insulation, weather stripping, caulking, energy-efficient lighting and refrigerators, window repair and more
- Furnace and water heater repair and replacement available to qualifying home owners
- <http://www.pge.com/energypartners/>



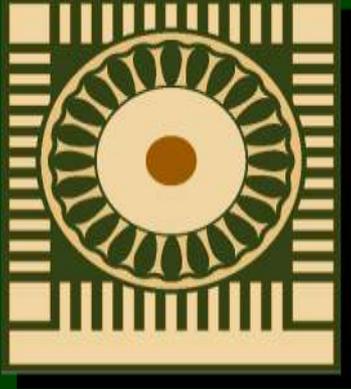
Assistance

Energy Upgrade California

Online clearing house for building energy retrofit programs, incentives, rebates, financing, qualified contractors

<http://www.acgreenretrofit.org/>





Staff Recommendations



Recommended Triggers

- Remodels/Additions > \$50,000; and
- Date Certain for Pre-1978 Homes (e.g., 2023 or 2025); and
- Time After Sale (2 years).

Remodel/Addition Trigger

- Remodel and addition projects that exceed \$50,000
- Used alone or in combination with other triggers in most RECOs
- Increased awareness
- Clearly defined event: building permit
- Cost of retrofits may be reasonable when compared with overall project

Date Certain Trigger (for pre-1978 Homes)

- Increased public awareness and encourages owners to use incentives while available
- Allows plenty of time to get RECO started, do education and outreach, work out administrative procedures
- Allows for important data collection and a mid-course review by the City (e.g., 2015) for possible revisions
- Increased resale value for owners who have met RECO requirements
- Create an opening to work with the California Public Utilities Commission (CPUC) and PG&E for a long term commitment to energy retrofit incentives that support a RECO
- Will establish an effective long term strategy by the City to work toward AB32 goals

Time After Sale Trigger

- Compliance by seller or buyer
- If buyer, could be completed within 24 months of sale
- Clearly defined event: transfer of ownership
- Used in a few RECOs including the Cities of Berkeley, and San Francisco, California and Burlington, Vermont
- Cost may be considered reasonable vs. other costs associated with the sale and some remodeling by buyer

Criteria for Recommended Prescriptive Measures

- Installed cost around or below \$3,000;
- Simple payback with no incentives \leq 30 to 35 years;
- GHG reduction in the range of 8% to 9%; and
- Improvement of HERS 2 existing rating by more than 10%

Recommended Retrofit Measures

Mandatory Features: low cost items such as low-flow toilets, showerheads and faucets; hot water pipe insulation; fireplace closures

Compliance Options: owner chooses any one of the following options in consultation with qualified performance contractor:

1. Air Sealing + R-30 Attic or Roof Insulation (from no insulation or existing insulation \leq R-13); or
2. Air Sealing + Duct Sealing (existing ducts); or
3. Air Sealing + R-19 Raised Floor Insulation (from no insulation) or
4. HERS 2 Rating + Improve Existing House Score by \geq 10%.
 - *If no prescriptive option is feasible, air sealing alone will meet the compliance requirement*

Compliance Options

	Compliance Options	Average Cost	Cost with PG&E and Current Federal Tax Credit	Cost with Possible Incentives (Homestar)
1	Air Sealing + R-30 Attic	\$2,589	\$2,199	\$1,589
2	Air Sealing + Duct Sealing	\$2,440	\$2,265	\$1,220
3	Air Sealing + R-19 Floor	\$3,016	\$2,836	\$1,508
4	HERS 2 Rating (Reduce Score by 20%)	variable	- 50%	- 50%
	Air Sealing Only	\$1,411	\$1,336	\$706



Cost Cap Recommendations

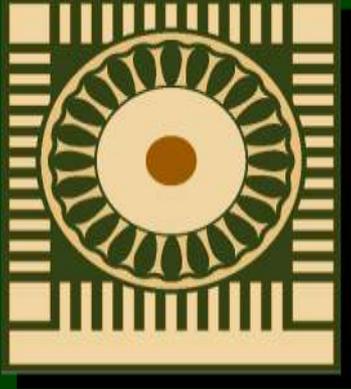
- Maximum expenditure by homeowner:
 - **Remodels/Additions > \$50,000:** None
 - **Point of Sale/Time After Sale:** 1.0% of sale price
 - **Date Certain:** 1.0% of assessed property value
- If homeowner demonstrates that no compliance option can be completed for less than Cost Cap, mandatory features and air sealing only shall meet the requirements.

Administration

- No City inspections.
- Air Sealing will require work by a BPI-certified contractor. Documentation will be required to be submitted to City.
- Administrative Fee of \$61 may be charged to cover costs.

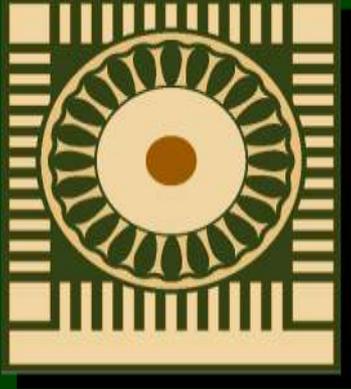
Common Questions

- **Are there exemptions for low income and/or disabled homeowners?**
 - Standard RECO will not apply, but owners must participate in PG&E's Energy Partners Program (as available).
- **What if I have already done work on my home?**
 - Previous work will qualify for compliance.
- **What if my home has no attic/crawl space/forced air furnace?**
 - If measures cannot be done, they will be exempted, however, air sealing and other low cost measures will be required.



Climate Action Management Team





Questions & Discussion



From: Chris Zaballos [mailto:czaballos@zaballos.net]
Sent: Monday, October 25, 2010 10:33 AM
To: Michael Sweeney; Bill Quirk; Olden Henson
Cc: Fran David; David Rizk
Subject: RECO Ordinance Comments

Members of the Sustainability Committee and City Staff,

I ask that you seriously consider the consequences that adoption of a RECO ordinance will have at this time on the sale of residential housing units in the City of Hayward. Clearly the market for existing homes is extremely difficult at best given the fact that 85% of the detached homes sold last year were either foreclosure or short sales. Simply put, the sellers of these homes were upside down on their properties and sold at a loss. Many of these foreclosure sales forced individuals and families into personal bankruptcy. While we can all agree that energy conservation absolutely makes sense, the adoption of RECO at this time in history is just ill-timed.

The housing recovery in Hayward will certainly be a slow process but a critical one. Our schools and local tax revenues depend on it. Adding one more expense to home sellers that are underwater is almost cruel.

My family has been in business in Hayward since the 1930's. Today we manage about 700 residential units and several hundred thousand feet of commercial in the city. During the recent economic downturn, rents in both residential and commercial sectors have reduced dramatically. Today, rental rates are back to those last seen in the early 90's. To combat this downturn (and the annual increase in operating expenses) we have taken numerous steps to reduce our energy consumption which remains one of our highest monthly expenses. As a company, we have made significant investments in new energy efficient controls for elevators; replacement of old chiller, air conditioning and boiler systems for with state of the art technology that saves significant energy; and the replacement of old lighting with new CFL's and LED lights that use a fraction of those they are replacing. We are making these changes not because of a City of Hayward mandate but because they just make business sense. Many of the changes we are making are applicable to all residential and commercial buildings (including single family homes) around town. Yes there is a cost in the short run. But, the long-term savings can be significant.

In closing, energy conservation is here to stay. It simply makes sense. But, forcing homeowners to make upgrades at point of sale in an extremely tough market is bad business for everyone. Rather than putting up one more hurdle for home sellers to navigate, the City of Hayward should be promoting energy education and conservation to all.

Sincerely,
Chris Zaballos
R. Zaballos & Sons, Inc.

From: James Ferry [mailto:bigif@pacbell.net]

Sent: Monday, October 25, 2010 6:09 AM

To: Amelia Schmale

Cc: Michael Sweeney; Bill Quirk; Olden Henson; Linda Williams; Barbara Halliday; Francisco Zermeno - Forward; Marvin Peixoto; Mark Salinas

Subject: Residential Energy Conservation Ordinance (RECO)

Members of the Hayward Sustainability Committee,

I am a long-time resident of Hayward who deeply cares about the future of our once nice city. Recently, I received a flyer regarding the special meeting of the development of a Residential Energy Conservation Ordinance (RECO) on October 25th, 2010 at the City Hall in the Council Chambers. While the goals of RECO may be noble, upon closer examination of this ordinance, I have serious trepidations and grave concerns about the timing of this action.

Is this committee unaware of the current housing market depression in the United States and California and especially in Hayward? Many of us already have houses which are underwater and now this ordinance adds insult to injury by substantially increasing our housing costs outflows by requiring expensive retrofits, costly repairs and pricy installations at a time when we don't have the funds to pay our mortgages let alone new double pane windows.

In anticipation of the costly RECO requirements and due to the rapidly deteriorating condition of Hayward, I know of at least two Hayward residents who have had enough and decided to move out of this area.

The residents of Hayward have already experienced a greater loss in property values as a percentage of our home prices than in neighboring areas. In addition to RECO costs, we also have to bear the burden of a sales transfer fee, a possible increase capital gains tax next year and then a 3.8 surcharge on capital gains because of the recently passed healthcare legislation.

In conclusion, as a deep-rooted long-standing resident of Hayward I urge you to please reconsider your ill-advised timing of RECO at least until housing prices in the City of Hayward recover.

Thank you.

James Ferry

192 Gloria St

510 581 7089



**Rental Housing Owners Association
of Southern Alameda County
1264 A Street, Hayward, CA 94541
510-537-0340**



October 22, 2010

**The Honorable Alice Lai-Bitker, President
Alameda County Board of Supervisors
15903 Hesperian Blvd.
San Lorenzo, CA 94580**

Dear President Lai-Bitker,

In April 2009, the Board of Supervisors adopted the Alameda County Green Building Ordinance (2009 GBO). The standards in the 2009 GBO generally meet, and in some cases exceed, the requirements of the new 2010 California green building (CAL Green) Mandatory Measures that goes into effect on January 1, 2011 as well as the current new 2010 tier one CAL Green Building Voluntary Measures.

In addition, the 2009 AC GBO applies to *Building Additions* in existing single family, multifamily residential and commercial buildings, as well as new buildings. The new CAL Green Code only applies to new construction.

We have in place a very strong green building ordinance that meets and or exceeds the new 2010 CAL Green Construction standards. Once you calculate the green house gas savings credits that are available to us, from taking into account the credits for all federal, state regional and local (including the 2009 ALCO GBO) they are, in our opinion equal to or exceed the required reductions in green house gas needed to meet our 2020 targets. Additionally, from a practical point of view, we do not need an additional layer of building code requirements when the existing 2009 GBO meets the new 2010 state green building code requirements. We already have an excellent system in place. We just need to give it time to work.

Thank you for your consideration of our concerns. We look forward to working with you in crafting a win-win solution for us all.

Respectfully,

Thomas R. Silva CPM
President, Rental Housing Owners Association
Of Southern Alameda County