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Subject:	CC2035 Plan Testimony - Jeffery W Frost
Date:	Thursday, August 11, 2016 3:55:06 PM

I love the thought of Portland moving to a requirement register and demonstrate compliance with a green building program. My concern is that there are a number of misconceptions relative to the advantages/disadvantages of LEED and Green Globes.

I can't stress enough the value of maintain a relationship with LEED Gold and not providing an option for Green Globes.

Green Globes likes to think they are better, faster, cheaper. This has been dispelled by an in-depth study done by BuildingGreen.

Their research has demonstrated that when you look at just certification and registration costs, Green Globes is higher by far regardless of the size and scope. On projects >50,000 sf and <500,000 sf the fees are double. This is largely due to the on-site assessor that has to come out to walk-thru the Green Globes projects.

- SERA has certified over 37 LEED projects since LEED's inception. To date, we have not certified any project using Green Globes. We have had clients explore this standard because they could not specific prerequisites of LEED in the past, but that is few and far between. Requiring the industry to operate within a different rating system would be costly, wasteful and counter-productive.
- 2. The prerequisites, credits and discipline of LEED consistently produce better results, especially in the critical area of energy performance.
- 3. If you look at 'soft-costs' they estimate about 300 hours for LEED and up to 95 hours for Green Globes. Green Globes process is considered easier. It is a checklist and online process that requires little documentation... while this is easier, it lacks rigor that is often needed to make sure that people meet the goals they have set out to implement.
- 4. Green Globes doesn't include requirements for Commissioning. This is one factor that helps make sure the building is function properly.
- 5. LEED buildings have a long track-record of performance tracking and while not all LEED buildings meet the expectations they set out for, Green Globes has not data on how their projects perform.
- 6. LEED requires metering and Green Globes does not. Metering is critical to understanding energy use and being able to understand a buildings performance.
- 7. There are only 575 Green Globes projects in the US.

- 8. There are over 21,000 LEED projects in the US.
- 9. Most people consider LEED to be the 'gold standard'.
- 10. LEED has a regional component that allows for extra credits for important regional attributes. Green Globes does not.
- 11. Green Globes does not reward innovation whereas LEED is completely flexible in how innovations can earn you credit.
- 12. Green Globes does not require a meeting with the owner.
- 13. LEED has far more rigorous credit requirements... can't just have old rusty bike rack. They have quality requirements and documentation requirements.
- 14. LEED has minimum Energy requirements and Green Globes does not.
- 15. Green Globes has been de-emphasizing water. There no prerequisite to reduce water use in Green Globes.
- 16. Green Globes does not have any credits relative to materials and toxic chemical avoidance. This is key issue today and they are silent on this issue.
- 17. Green Globes was started largely by big industry and still to this day has a board that is represented heavily by big industry. Over 30% of their members are trade groups. Membership in GBCI is highly costly and very few companies can afford to buy a membership. Weyerhauser is a board member.
- 18. A government program or policy should not support an institute who's board members come from organizations that actively engage in lobbying against best practices and standards.
- 19. As far as I can tell, the argument for Green Globes is political and nearly always talks about the need for "flexibility". This is at the sacrifice of "leadership". In my opinion, one of the roles of government is to help lead. Flexibility and leadership are not the same.
- 20. Green Globes breaks standards like ASHRAE 62.1 into many micro credits. This means people could comply with one option but not another.
- 21. Green Globes still refers to the 2004 CDPH emissions test for wet-applied products. The 2010 version, which is required by LEED v4, is far more rigorous and requires decreased emissions levels from chemicals.
- 22. Green Globes credentials are open book and require no ongoing education. They don't set

people up to understand or gain the knowledge.

- 23. Green Globes 2013 was created by staff and not by the ANSI process. US GSA says that both standards are consensus based.
- 24. There are only 29 Green Globes professionals in the entire state of Portland (<u>https://www.thegbi.org/professional-certification/professional-directory/?state=Oregon</u>) ... while there are over 1290 LEED accredited professionals in PDX. (source: <u>http://www.usgbc.org/people</u>).

Please don't let the politics get in the way of this measure. Green Globes is nowhere near an 'equal' standard with LEED. I would not put good faith in the counter arguments as they tend to not fully understand the differences but merely see them from one single myopic viewpoint; not as a total overall approach.

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