



Building Owners & Managers
Association Seattle King County
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January 7, 2009

Jayson Antonoff, Green Building Team
Department of Planning and Development
(jayson.antonoff@seattle.gov)

Amanda Eichel, Office of Sustainability and Environment
(Amanda.eichel@seattle.gov)

Dear Jayson and Amanda:

I want to express my appreciation for being invited to participate on the Mayor's Green Building Task Force, specifically to address sustainability for Existing Buildings.

As you know, I represent the building owners and managers responsible for approximately 35 million square feet of commercial space in downtown Seattle. I am grateful to be able to share the "hands-on", actual information and examples of how buildings are operated and maintained, how investment decisions are made and improvements implemented. BOMA members are management professionals whose natural inclination is to be efficient and competitive. Seattle building owners and managers demonstrated leadership in the areas of conservation, energy efficiency and sustainability long before there was a general market awareness or interest.

BOMA is a long time partner with the City of Seattle on all issues relevant to the office building industry and has been a leader in pursuing conservation, energy efficiency and putting environmentally friendly practices into place.

We urge the City of Seattle to continue to offer and use incentives and to carefully consider all the facts that have been gathered (and which are always available to share) about the complexities of owning and operating a building so that we actually get the results we seek. Our experience has shown that significant success happens when environmental and sustainability goals and targets are crafted to allow building owners and managers great flexibility and leaves room for creativity.

Listed below are BOMA's key concerns in response to policies being considered by the Existing Buildings Committee. We urge your thoughtful consideration of these very important issues.

Please feel free to contact me if I can answer any questions or can provide further information and assistance.

Sincerely,

A handwritten signature in black ink that reads "Rod Kaufmann".

Rod Kaufmann, President
BOMA Seattle/King County

Encl.

Cc:

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BOMA Board of Directors

The Building Owners and Managers Association respectfully submits the following comments regarding policies being considered by the Mayor's Green Task Force – Existing Buildings Committee:

Disclosure: Disclosure should remain voluntary not mandated. Potential buyers, renters and lenders can ask for performance information and if the market demands it, the information will be provided. Owners should not be required to publicly report utility data. The market will determine if disclosure becomes a market differentiator that drives investment in efficiency by current property owners. If owning an environmentally more desirable building is a market advantage then this fact alone will drive carbon reduction investments and disclosure.

Financing and Funding: Capital sources such as, low interest loans, private financing pools, and energy efficiency lending should be encouraged. Innovated repayment methods should be supported such as on-bill financing.

Incentives: Energy efficiency tax credits and especially, more favorable utility funding and matching programs will be the most effective method of encouraging capital investment in energy conservation measures. The closer the payback periods on energy efficiency measures can be shortened to a two-year payback, the more likely the efficiency investment will be realized. The reality of the commercial real estate marketplace is that paybacks that are required by large tenants, who have authority within leases to approve capital spending, are not accepting anything beyond two years. Fee-bates should not be implemented for existing buildings.

Codes, Permitting and Upgrades: The Seattle commercial energy code already sets a standard that is high above other municipalities and therefore there is little room for additional code-driven efficiencies, certainly no cost effective ones. No retroactive code changes should be considered for existing buildings. The City should encourage carbon reduction by providing land use and permitting incentives.



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BOMA's LEADERSHIP IN CONSERVATION & SUSTAINABLE BUILDING OPERATIONS

January 2009

The Building Owners and Managers Association of Seattle King County (BOMA), represents the owners and managers of approximately 35 Million square feet of office and commercial real estate in Seattle and an additional 30 million square feet in King County as well as 155 firms that supply goods and services to the commercial real estate industry. BOMA, through its members, communicates to businesses and building tenants about issues such as job creation, economic development, and those issues that promote a prosperous business climate and quality of life.

BOMA Seattle King County is proud of its leadership and commitment to sustainability and promoting a healthy environment. Our leadership includes many voluntary actions specifically aimed at energy conservation and achieving sustainability goals in all aspects of commercial building design, construction, operations, management and maintenance.

Recent accomplishments made by BOMA-Seattle/King County include:

- In 2007 and 2008 BOMA – Seattle/King County sponsored and facilitated twelve workshops on energy efficiency that educated more than 300 commercial real estate professionals on the importance of and how to achieve energy use reduction in their buildings and businesses. These workshops covered a wide range of best practices related to environmental stewardship and energy conservation
- In 2008 BOMA-Seattle/King County sponsored and managed the Kilowatt Crackdown contest. This resulted in 67 BOMA member buildings, representing over 20 million square feet of office space being benchmarked through EPA's Energy Star Portfolio Manager rating system.
- In September 2008, Seattle City Light and Puget Sound Energy awarded BOMA Seattle King County the 2008 Power Player Award for "Exemplary Commitment to Energy Efficiency and Environmental Stewardship"
- BOMA Seattle King County has endorsed BOMA International's 7-Point Challenge to reduce the use of natural resources and non-renewable energy sources.
- In 2009 BOMA has scheduled two energy star benchmarking courses and two energy efficiency courses and will have a summer intern to assist members in voluntarily benchmarking their buildings energy performance through Energy Star's Portfolio Manager.



In addition to accomplishments BOMA has achieved as an industry organization, BOMA's members, with buildings in Seattle, Bellevue and throughout King County, have made significant investments implementing sustainable practices beginning as early as the 1990's.

BOMA member investments in building operations and energy use reduction include, but are not limited, to the following:

- Lighting control systems - controlling corridor lights, exterior lights, exhaust fans, circulation pumps, steam valves and hot water tanks through the use of time clocks and photo eyes, garage lighting.
- Occupancy sensors installed in common area corridors, restrooms and mechanical rooms.
- Lighting retrofits in tenant spaces, hallways, restrooms and parking garages.
- Window blinds on exterior windows, encouraging proper use to cut down on solar gain.
- Building elevators upgrades
- Reflective coatings on roofs also reduce solar gain.
- Programmable set back thermostats for HVAC equipment
- Use of “green” cleaning supplies and materials.
- Recycling – in addition to paper, glass and plastic, special recycling of electronics, furniture and equipment.
- Low flow toilets and urinals.
- Low flow, auto shutoff faucets for common area restrooms.

The Pacific Northwest region uses hydroelectric power and other renewable sources of energy which is very different from other parts of the country that rely upon burning coal or oil. This fact, along with the investments that have been made and practices already in place, must be taken into account when measuring the performance and successful achievement of our sustainability goals.

BOMA remains dedicated to continuing its efforts toward achieving increased energy efficiency and reducing Green House Gas Emissions.

BOMA Seattle King County recommends the following public policy framework for environmental policy with respect to reducing the carbon footprint of existing commercial buildings

Provide Incentives Over Mandates: BOMA urges options that are performance based and not prescriptive. BOMA is a willing partner to assist in the understanding of how buildings operate and the most effective way to incentivize capital investments or operating procedures that will help us achieve our mutual goals of improving energy efficiency and reducing greenhouse gas emissions that will serve us well into the future.

Establish Fair and Equitable Benchmarks: It is critical that government policy makers credit the efficiencies already achieved by property owners over the last several years. Commercial real estate in Seattle and the greater Puget Sound region is designed and operated demonstrably more efficient than many other regions in the country already. Efficiency investments that have already captured significant energy savings and carbon reduction should be fully credited.

Design Flexibility, Alternatives, Options and Incremental Goals into Energy Efficiency Measures. No two buildings operate exactly alike and therefore any truly successful initiative will provide for a menu of tools to achieve the goals. Setting incremental goals is sometimes the only

economically viable course of action and therefore the only way the goal will be reached in the long term.

Consider Economic Impact. A strong economic environment is not only critical to the commercial building industry, it is critical to government in order to continue to fund benefits and amenities that are enjoyed by all.

- Capital costs associated with energy conservation and sustainable measures are only one aspect of the total capital associated with owning and operating a commercial building. Competing needs include: fire code, building code, energy code, ADA compliance, seismic upgrades, fire life safety and solid waste and recycling.
- Existing buildings were constructed over many years and during many different versions of building codes with technologies that are not available today. Retroactive code is appropriate for only the most critical life safety concerns.
- It is important that a complete analysis (fiscal note) of comprehensive economic impacts to business be performed for any proposed program.

Commit to a Measurable and Specific Scope of Work. Ensure task force or workgroup processes stay focused and are appropriate for the building owners and managers. For example building management cannot force tenant behavior, only encourage it. Energy efficiency policy development that affects building ownership and management will consider only those things for which ownership and management has control.

Contact:

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