



March 6, 2014

Director Paul Thomsen
Governor's Office of Energy
755 North Roop Street, Suite 202
Carson City, NV 89701

RE: Comments on Proposed Regulation, LCB File No. R127-13

Dear Director Thomsen:

The American Chemistry Council (ACC) supports the proposed amendments to the state's existing Green Building Leadership in Environmental Design (LEED) Tax Abatement Program. Under the proposed regulations the Green Globes standard would be equivalent to LEED standards in determining eligibility of a building for a partial abatement of specified property taxes.

ACC supports the construction of buildings that save energy, use materials that promote resource conservation and offer employees a safe and healthy working environment. Building green is a complex undertaking that requires a fair, open, and science-based evaluation process that allows all materials and products to compete on a level playing field. Many "green building" tools are available to architects, policymakers and others that combine life-cycle costs and assessment data to discern environmental and economic tradeoffs, allow for a fair comparison of products and rely on standards developed by consensus-based groups.

Green Globes is a product of the Green Building Initiative (GBI), whose mission is to "promote practical green building approaches to energy efficient and environmentally sustainable building practices commonly referred to as green building. GBI is focused on ensuring the availability of credible and practical green building approaches within the residential and commercial construction industries." Green Globes is a performance based, material neutral, affordable, and is "life-cycle" oriented.

Further, the GBI is an accredited standards developer by the American National Standards Institute (ANSI). The ANSI process is a consensus-based process that provides a neutral forum for the development of policies on standards issues. In this role, ANSI helps maintain the high quality and integrity of standards development and conformity assessment programs and processes in the United States. The ANSI process ensures that the principles of openness, balance of interests, due process and consensus have been achieved in the standards development.

The proposed regulations will provide builders and others the flexibility to further implement sustainable construction in a balanced, a cost effective manner. If you have any questions, please do not hesitate to contact me at 916-448-2581 or by e-mail at Tim_Shestek@americanchemistry.com. Thank you in advance for considering our views.

Sincerely,

A handwritten signature in black ink, appearing to read "Ti Sh", with a long horizontal flourish extending to the right.

Tim Shestek
Senior Director, State Affairs

