

18 January 2021

Peter Doo, FAIA, LEED Fellow, GGP
Doo Consulting LLC
531 Piccadilly Road
Towson, MD. 21204

Re: SB0228

My name is Peter Doo. I am a Fellow of the American Institute of Architects and a LEED Fellow. I am a past president of USGBC Maryland and AIA Baltimore. I have been a member of the Maryland Green Building Council and a commissioner with the Baltimore City Sustainability Commission and I would like to add my voice in support of SB0228.

My company, Doo Consulting LLC, is a sustainability consulting company with a decade and a half of green building experience. There are six staff, including myself. Five of us are Maryland State residents. We have certified well over 100 LEED, Green Globes and Living Building Challenge projects, including a number of “LEED equivalent” projects. I am here representing myself and my staff but believe that my thoughts are shared by the green building consultant community and many design professionals in Maryland, all of whom love this State and are working to contribute to a livable future here.

This Bill rescinds the “LEED (or other green rating system) Equivalent” option that was passed in legislation in 2018. The LEED Equivalent option is based on the assumption that this approach will yield the same quality result and save the State money in the process. Both of these assumptions are incorrect for the following reasons.

1. From experience, I can assure you that “LEED equivalent” is seldom that. Project teams doing equivalent projects do not apply the same rigor to the design or construction that is applied to a certified project. Corners are cut. Compliance requirements are considered “close enough”. The introduction of a non-compliant material on the job is “not to be worried about”. It’s human nature. WHEN THERE IS A REFEREE ON THE FIELD, THE GAME IS PLAYED DIFFERENTLY. In this case, the certifying body is that referee ensuring that the Maryland taxpayers are getting what they are paying for.

2. If the project is truly and verifiably “LEED Equivalent” project team members are putting in exactly the same effort that they would apply to a Certified project including whatever documentation is necessary to make this declaration. That effort is reflected in the project cost whether certified or not. The only costs saved are the registration and certification fees which amount to 5 to 6.5 cents per square foot while the building costs can be \$300 to \$400 per square foot and above. For a 90,000 SF / \$31,000,000 school, for example, the savings would be two one-hundredths of a percent. Let me be clear, THE COST FOR THE DESIGN AND CONSTRUCTION OF A VERIFIED GREEN BUILDING IS NO MORE OR LESS FOR LEED OR ANY OTHER VERIFIED RATING SYSTEM. For the few additional cents of cost for certification, the owner, in this case the State of Maryland, receives a third-party verification that the building has met the energy and environmental performance that the State requires and from which it will benefit for the life of the building.

It is also human nature to be somewhat competitive. I have seen the power of a rating system encouraging a project team to make the effort raise performance levels to achieve additional points when the measures and metrics indicate that they are close. This is just the opposite effect of a non-certified project. In that case, the mantra is often, “What do we have to do to meet code?” (or other minimum requirement). Again, the beneficiary of that competitive spirit is the State and citizens of Maryland.

Finally, just a reminder that rescinding this bill preserves the previously existing option of a “no cost” compliance path which is the International Green Construction Code (IgCC).

Passage of this Bill will put things back as they were when green building certification was required, when that was the selected compliance path. It does not cause the State to accept anything it hasn’t previously accepted or that the State didn’t think was good practice. I encourage you to support this Bill for the benefit of all Marylanders.

Thank you.

A handwritten signature in black ink, appearing to read "P. Durra".

Also representing: Lorraine Doo, Mudhar AlDurra, Rebecca Gullott, Megan Knox, and Andrew Koenings from Doo Consulting LLC.