



Docket No. GSA-GSA-2014-0002-0015
GSA Notice-MG-2014-04

COMMENTS OF:
THE INTERNATIONAL CODE COUNCIL (ICC)
500 New Jersey Ave, NW
Washington, DC 20001

March 20, 2015

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Conference of Building Officials (ICBO), and Southern Building Code Congress International, Inc. (SBCCI). Since the early part of the last century, these non-profit organizations developed three separate sets of model codes used throughout the United States. Although regional code development was effective and responsive to our country's needs, the time came for a single set of codes. The nation's three model code groups responded by creating the International Code Council and by developing codes without regional limitations; the International Codes.

Re: Notice-MG-2014-04

As an organization interested in promoting federal building safety and energy efficiency we appreciate the opportunity to provide comment on green building certification system alignment with Federal requirements and how best to utilize the credits and strategies to accomplish federal goals.

The Federal government has an obligation to use financial resources judiciously and transparently. The report that General Services Administration (GSA) released last year recognized that LEED v4, among other available green building and rating codes and standards, can assist the federal government in reducing energy consumption. Of particular note, we agree with the agency's finding that the LEED v4 rating system sets more stringent baselines for energy than previous versions, which exceed existing federal code requirements.

In the application of LEED v4 or other green building rating systems or standards it is imperative that GSA and other agencies prioritize energy efficiency in the construction, design and operations and maintenance of Federal projects. To that end, we encourage the agency to prioritize use of credits including: enhanced building commissioning, enhanced energy performance, advanced energy metering and demand response in the application of LEED v4.

In future reviews of rating systems, GSA should evaluate data on post-occupancy performance of buildings certified under a given system, to ensure buildings perform and in light of DOE's recent Rule on Green Building Certification Systems for Federal Buildings (see 10 C.F.R. § 433.300(b)(5)).

We also note that while GSA's legal mandate is to evaluate "green building rating systems," that since the time of the enactment of the legislation creating that mandate, several codes and standards have been developed (*International Green Construction Code*®, and ASHRAE 189.1-Standard for the Design of High Performance Green Buildings) which also focus on green buildings, and which generally coordinate with existing green building rating systems. We believe that GSA should examine how these codes and standards can also be used by Federasitentit4(O)-MB)