

Summary of Comments Received during the Public Comment Period on GSA's Green Building Certification Systems Review

Section 436(h) of the **Energy Independence and Security Act of 2007 (EISA)** requires the General Services Administration (GSA) to evaluate green building certification systems every five years and provide the findings to the Secretary of Energy who, in consultation with the Secretary of Defense and the Administrator of General Services, formally identifies the certification system(s) to be used across the federal government. GSA's Office of Federal High-Performance Green Buildings conducted an analysis of the commercial building certification system market and identified six building certification systems that were available for use in the United States, addressed whole buildings rather than individual building components or products, awarded certification based on validation by an independent third-party assessor, and incorporated measurable or calculated metrics to assess building performance.

The six systems reviewed were:

1. BOMA BEST 4.0 for Sustainable Buildings
2. Building Research Establishment's Environmental Assessment Method (BREEAM) USA In-Use, version 6
3. Green Globes, version 2021 (for New Construction) and 2023 (for Existing Buildings)
4. Leadership in Energy & Environmental Design (LEED), version 4.1
5. Living Building Challenge (LBC), version 4.0 and Core Green Building Certification
6. Passive House Institute US, Inc. (PHIUS), 2021 CORE, CORE REVIVE, ZERO and ZERO REVIVE

Each of these certification systems were assessed against a set of review criteria to evaluate how effectively the systems align with current federal green building requirements. GSA conducted the review in 2023 and published its [Green Building Certification System Review Findings Report](#) (Findings Report) in July 2024. GSA found that each building certification system offers a unique framework and approach to achieving building certification, and they all generally align on the aspects of building design, construction, operation, and maintenance that lead to green commercial office buildings. At the same time, GSA found that no single system fully ensures compliance with all federal building performance requirements.

To inform GSA's final recommendations, GSA held a 60-day public comment period on the following draft recommendations based on the Findings Report:

1. GSA recommends that agencies consider using LEED or Green Globes for new construction or major renovation projects. Both of these systems meet the basic requirements established under [DOE Rule: Green Building Certification Systems Requirement for New Federal Buildings and Major Renovations of Federal Buildings](#).
2. For existing buildings, GSA recommends that agencies consider the use of BOMA Best, BREEAM In-Use, Green Globes, LEED, Living Building Challenge, Living Building Challenge CORE, or PHIUS Revive. Each of these systems contains requirements and options that align to varying degrees with green buildings performance criteria and provides a sound approach to certification of

high-performance green federal buildings.

3. It is important for agencies to ensure that the options selected within a certification system are those that align with federal green building performance criteria in order to realize the benefits of using such a system. GSA recommends agencies use the certification system that best meets their mission, building type, and portfolio needs and certify to a level that promotes the high-performance green building goals referenced in Executive Orders 14008 and 14057.
4. In addition, while not part of the scope of this statutorily-required review, there are other building certification system modules available in the marketplace that focus on net-zero carbon, energy, waste, and water. GSA's Green Building Advisory Committee noted many of these systems in Exhibit B of its [Advice Letter on Recommendations for achieving EO 14057 Green Leasing Targets](#). GSA believes agencies should become familiar with these systems as they may also support the net zero goals contained in Executive Orders 14008 and 14057.
5. The use of third-party certification systems, when properly aligned with building performance requirements, saves resources by eliminating the cost to the government of developing its own duplicative building certification system while drawing on the expertise of the private sector.

Interested stakeholders submitted comments to highperformancebuildings@gsa.gov, a GSA email account managed by the GSA Office of Federal High-Performance Green Buildings. The public comment period closed on August 29, 2024, and all comments were reviewed and analyzed to inform GSA's final recommendations to the Secretary of Energy.

Results Overview

GSA received a total of **9** comments from **7** different organizations, including industry associations, design and consulting firms¹, owners of green building certification systems, and government agencies. Table 1 summarizes the number of comments submitted by organization type.

Table 1. *Types of Organizations That Submitted Comments*

Organization Type	Number of Comments
Design (A&E)/Consulting Firm	2
Industry Association	1
System Owner	3
Government	2
Anonymous	1

¹ Includes Design, Architectural, Engineering, and Consulting Firms

The comments covered the following common themes:

- **Theme 1:** Supporting or opposing a particular system(s) that GSA reviewed;
- **Theme 2:** Requesting clarification or correction to GSA's draft recommendations, Findings Report and/or review methodology; and
- **Theme 3:** Requesting an updated and/or supplemental review of a building certification system.

Theme 1: Supporting or Opposing a Particular System(s) that GSA Reviewed

GSA received **1** comment from an organization that supported GSA's findings that LEED is highly aligned with federal requirements, and additionally, that GSA should recommend that all projects continue to pursue LEED certification. Additionally, the comment advocated for GSA to identify pilot projects with net-zero carbon aspirations to pursue the Living Building Challenge.

GSA also received **1** comment specifically opposing the recommendation of Green Globes. The comment raised concern over the amount of time it takes to complete certification.

GSA Response:

GSA values the insights and opinions shared by submitters regarding the various green building certification systems available in the marketplace. While these comments are appreciated, they have not prompted any modifications to GSA's proposed recommendations. GSA encourages agencies, if they decide to pursue a certification system, to choose the one that best aligns with their mission, building type, and portfolio needs.

Theme 2: Requesting Clarification or Correction to GSA's Draft Recommendations, Completed Findings Report and/or Review Methodology

GSA received **2** comments regarding one of GSA's draft recommendations: "The use of third-party certification systems, when properly aligned with building performance requirements, saves resources by eliminating the cost to the government of developing its own duplicative building certification system while drawing on the expertise of the private sector." These comments expressed concern that the inclusion of this recommendation discourages use of the Guiding Principles Assessment Criteria and implies replacing it with a third-party certification system in the future.

While the public comment period was specifically aimed at receiving comments to GSA's draft recommendations, GSA also received **4** comments that proposed edits or requested clarification regarding the Findings Report, its appendices, and the overall review methodology. A couple of these comments came from a system owner included in GSA's review. Some comments noted technical corrections needed in the Findings Report and its appendices, while other comments requested GSA evaluate a system's partial compliance against additional criteria not included in the original submission.

Additionally, GSA received a comment recommending that GSA expand its review approach so that the 'Enhance the Indoor Environment' effectiveness criterion includes the additional

sub-criterion of 'Acoustic Comfort and Noise Mitigation.'

GSA response:

GSA is not suggesting that agencies stop using the Guiding Principles. Agencies are directed through Executive Order 14057 section 205 (c)(iii) to "implement CEQ's Guiding Principles for Sustainable Federal Buildings in building design, construction, and operation of all new Federal buildings and renovated existing buildings." While using third-party building certification systems is not mandatory, agencies may choose to employ them to validate and ascertain whether they have met the Guiding Principles for their particular building. Although no statute requires agencies to use building certification systems, they have proven valuable for determining conformance with the Guiding Principles.

GSA also appreciates the comments proposing edits and clarifications in the Findings Report and its appendices. GSA has made the necessary revisions and has published a revised version on its [website](#).

While not included in this review cycle, GSA will consider including enhanced review criterion for acoustic comfort and noise mitigation in future reviews.

Theme 3: Requesting an Updated or Supplemental Review of a Building Certification System

GSA reviewed versions of 6 systems that were available for commercial use as of the end of calendar year 2023. Since then, several system owners have either released or plan to release updated versions of their building certification systems. GSA received a comment from a system owner requesting that GSA conduct a supplemental review of Green Globes for New Construction 2024, which was released in Q3 of 2024.

Additionally, GSA received a comment specifically requesting the review of UL Solutions' SPIRE Smart Building and Smart Systems Rating programs, the GBCI Guiding Principles Assessment program, and the GBI Guiding Principles Compliance program.

GSA Response:

GSA will be conducting a comprehensive review of Green Globes for New Construction 2023 this coming calendar year. Additionally, GSA is reviewing the soon-to-be-released LEED v5 and PHIUS 2024 certifications.

While GSA values both Guiding Principles Compliance programs from the U.S. Green Buildings Council and the Green Building Initiative, it does not consider them distinct green building certification systems. Instead, GSA views them as supplemental tools agencies can use to determine compliance with the federal government's Guiding Principles for Sustainable Federal Buildings.

GSA reviewed both UL Solutions' suggested programs and determined that they do not fit the scope of this statutory-required review.