



GSA Public Buildings Service

February 24, 2025

MEMORANDUM FOR: Public Buildings Service Regional Commissioners; Assistant Commissioners; and Directors of Design and Construction, Facilities Management, Project Delivery, and Portfolio Management

FROM: Charles Hardy, AIA, CCM, Chief Architect
Public Buildings Service Office of Architecture and Engineering (PA)

SUBJECT: Rescission of PBS P100 Facilities Standards, and Issuance of PBS Interim Core Building Standards

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Charles G Hardy

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References:

- A. [EO 14148 - Rescissions of Harmful Executive Orders and Actions](#)
- B. [EO 14154 - Unleashing American Energy](#)
- C. [Section 2309 of the Water Resources Development Act](#) (WRDA), Public Law No. 118-272

Purpose: Pursuant to Executive Orders issued since January 20, 2025, and the subsequent cancellations of associated GSA and PBS orders, it has been determined that the current version of **The Facilities Standards for the Public Buildings Service (P100)** is no longer applicable and is rescinded, unless otherwise permitted herein or by written concurrence of the PBS Commissioner. Until a process is developed to update the P100 in accordance with the WRDA, this informational memorandum (memo) is being provided to assist project managers, contracting officers, and others involved in the preparation of contract documents for architects/engineers and general contractors. This document provides a list of laws, regulations, and codes for projects under design and construction.

Project delivery teams that have not yet reached the delivery milestone identified in the “Applicability” section below will use the list of laws, executive orders, codes, and regulations, as summarized in the attached Appendix A: **PBS Interim Core Building Standards**.

Applicability: This memo applies to projects that:

1. are in GSA-owned or lease-construction facilities, regardless of funding source, budget activity, or project contract value (e.g: design, construction, services, and study contracts); **AND**
2. have less than 50% of construction activity completed as of January 21, 2025, as measured in dollar value.

Projects that have completed 50% or more of construction activity, as measured in dollar value, may continue to utilize the P100 version per the contract documents and implement this memo to the greatest extent possible where it does not create significant adverse financial, life safety, security, and/or critical building operation impacts.

Effective Date: This memo is effective immediately and remains in effect until canceled by written notification.

APPENDIX A:
PBS INTERIM CORE BUILDING STANDARDS

February 24, 2025

The **PBS Interim Core Building Standards** lists laws, Executive Orders, codes, regulations, and standards for use by contracting officers, projects teams, and others involved with developing contract documents for design, construction, renovation, or maintenance projects. These standards are for reference only and do not intend to portray a fully complete list of all applicable laws and regulations that may need to be incorporated into the contract documents. They summarize key aspects of laws and regulations that are of particular relevance to these types of projects. Compliance with applicable laws and standards is the responsibility of the contractor.

Project teams must use these standards regardless of the funding source, including projects funded through BA51 New Construction, BA54 Minor Repairs and Alterations, BA55 Special Emphasis Programs, and BA55 Major Repairs and Alterations, BA61 Operating Funds (including work performed under operations and maintenance contracts), BA63 Energy Rebates, BA64 Historic Preservation, customer-funded projects through BA80 Reimbursable Work Authorizations, and privately-financed projects such as Energy Savings Performance Contracts.

Project teams must use the latest published edition of these authorities and references in effect at the time of project solicitation, along with any subsequent executive orders in effect as of the project’s solicitation date. Please discuss any questions or concerns with the regional project management team. Items listed in Section 1: General apply to all aspects of the project. Other sections denote specific requirements related to that section.

Designs must be developed under the direction of, and bear the seal of, a licensed design professional in the State, District, or Territory of the project location.

Section 1: GENERAL	
Name	Notes
Laws	
Energy Act of 2020	Imposes energy performance standards, e.g. from ASHRAE and energy codes.
Energy Independence and Security Act of 2007 (EISA 2007)	433(a)(D)(i) (modifying 42 USC 6834): “For new Federal buildings and Federal buildings undergoing major renovations, with respect to which [GSA] is required to transmit a prospectus to Congress . . . sustainable design principles [see 401(13)] shall be applied to the siting, design, and construction of such buildings”.
	433(a)(D)(i)(I) : Comply with: <ul style="list-style-type: none"> • 10 CFR 433.100 Energy Efficiency Performance Standard • 10 CFR 433.101 Performance level determination • 10 CFR 433.200 Scope 1 Fossil fuel-generated energy consumption requirement. Federal Building Energy Efficiency Performance Standards (phased approach, present - April 30, 2025; full compliance, no later than May 01, 2025); and • Clean Energy Rule Implementation Guidance
	438 . Manage stormwater as detailed in Section 6 below.

Section 1: GENERAL	
Name	Notes
Energy Policy Act of 2005 (EPAct)	<p>103 requires Advanced Metering to the maximum extent practicable</p> <p>104 (amending 42 USC 8259(b)) Federal Procurement of Energy Efficient Products: Specify Energy Star-certified or FEMP-designated energy-consuming products, except where unavailable or not life cycle cost-effective.</p> <p>109 Federal Building Performance Standards: If life-cycle cost-effective, new Federal buildings must be designed to achieve energy consumption levels at least 30% below ASHRAE 90.1.</p>
National Energy Conservation Policy Act	42 USC 8253 : Energy and water management requirements
Clean Air Act (42 USC 7401 et seq.)	<p>Provides emissions standards for sources including HVAC and generators.</p> <p>42 USC Chapter 85, Subchapter VI 7671 - Federal Procurement</p> <p>42 USC Chapter 85, Subchapter VI §7671k - Safe Alternatives</p> <p>40 CFR Part 82 Protection Of Stratospheric Ozone</p>
Toxic Substances Control Act (TSCA)	15 USC 2601 et seq. Addresses hazardous substances including asbestos, lead, and PCBs
American Innovation and Manufacturing Act	42 USC 7676 Requirements for HVAC / refrigerant procurement
Buy American Act	48 CFR 25.2 Use only domestic construction materials in construction contracts
Trade Agreements Act of 1979 and FAR part 25 implementing regulations	Implements numerous multilateral and bilateral international trade agreements and other trade initiatives.
Randolph-Sheppard Act	20 USC 107a The Randolph-Sheppard Act provides qualified blind persons the opportunity to operate businesses on federal, state, or other property. The design team must coordinate design with the state licensing agency.
Resource Conservation and Recovery Act of 1976 (RCRA)	6962 (42 USC 6962) : procure applicable materials composed of the highest percentage of recovered materials practicable, where reasonably available within a reasonable period of time at a reasonable price, and meeting applicable performance specifications.
	6966(b)(2) (as amended by EPAct 2005 section 108): “give priority to achieving greater use of recovered mineral component [e.g. recovered or diverted waste material or byproduct such as slag or fly ash] in cement or concrete projects for which recovered mineral components historically have not been used or have been used only minimally”.
2018 Agricultural Act § 9002 (Public Law No. 115-334)	Use Comprehensive Procurement Guidelines (CPG) to take a system approach to reducing life cycle material use and impacts.
Biobased markets program	7 USC 8102 Use the BioPreferred program to specify biobased products.

Section 1: GENERAL	
Name	Notes
Trade Facilitation and Trade Enforcement Act of 2015 (TFTEA)	19 U.S.C. §§ 4301-4454 . Prohibits products created with forced or child labor.
Uyghur Forced Labor Prevention Act (Pub. L. 117-78, 135 Stat. 1525)	The design team must specify products that do not use forced or child labor.
The National Historic Preservation Act (NHPA) of 1966 as amended, Pub. L. 89-665, 80 Stat. 915	54 U.S.C. § 300101 et seq. Federal agencies shall strive to rehabilitate historic properties in a manner that preserves their architectural character, in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (36 CFR 68).
	GSA Order ADM 1020.3A: Procedures for Historic Properties .
Disaster Resiliency Planning Act of 2022 (PL 117-220)	Incorporate natural disaster risk assessments provided by the agency or its contractors into real property investments.
The Architectural Barriers Act Accessibility Standard (ABAAS) (42 U.S.C. § 4152)	36 CFR §1191 : ABA Chapters 1-10 and Appendices C and D ensure that federal facilities are accessible to persons with physical disabilities
	GSA’s National Accessibility Program Standards Policies and Procedures fulfill the requirements of ABAAS F103 Modifications and Waivers by describing accessibility expectations and the process for administering waivers/modifications.
	FMR Part 102-76, Subpart C, 41 CFR § 102-76.60 et seq.
Executive Orders	
EO 14154: Unleashing American Energy	§7(b): When procuring goods and services, making decisions about leases, and making other arrangements that result in disbursements of Federal funds, agencies shall prioritize cost-effectiveness, American workers and businesses, and the sensible use of taxpayer money, to the greatest extent.
EO 14148 - Recissions of Harmful Executive Orders and Actions	§2: Revoked EOs related to Federal Sustainability, Public Health and the Environment, Worker Health and Safety, and implementing the Infrastructure Investment and Jobs and Inflation Reduction Acts.
Codes, Regulations, and Standards	
40 USC § 3312 - Compliance with nationally recognized codes	To the maximum extent feasible, use model building codes and other applicable nationally recognized codes. Cooperation With State and Local Officials
42 USC 6834 Energy Conservation and Resource Renewal	Federal building energy efficiency standards, renewable energy for water heating, water conservation technologies.
10 CFR Part 436 - Federal Energy Management and Planning Programs	Subpart A - Use Methodology and Procedures for Life Cycle Cost Analyses (436.10 – 436.24) to evaluate the cost-effectiveness of systems that impact energy or water use (e.g. HVAC, water heating, controls, lighting, enclosure).

Section 1: GENERAL	
Name	Notes
	<p>Consider up-front, operating, and salvage costs over the life of equipment to identify the least costly alternatives.</p> <p>See also National Institute of Standards and Technology (NIST) Life Cycle Costing Manual (NIST Handbook 135)</p> <p>Subpart B - Methods and Procedures for Energy Savings Performance Contracting</p> <p>Subpart C - Agency Procurement of Energy Efficient Products</p>
National Institute of Building Sciences (NIBS)	United States National CAD Standard
Construction Specification Institute (CSI) MasterFormat - Division/Section/Page Format	Specifications must follow this format
International Code Council (ICC) I-Codes	<p>The latest published edition of the ICC I-Codes in effect at the time of project solicitation must be used throughout design and construction.</p> <p>Per 40 U.S. Code § 3312, GSA has adopted the technical requirements of the International Building Code (IBC), International Fire Code (IFC), International Plumbing Code (IPC), International Mechanical Code (IMC), International Fuel Gas Code (IFGC), International Existing Building Code (IEBC), International Property Maintenance Code, International Private Sewage Disposal Code (IPSDC), International Zoning Code (IZC), International Wildland-Urban Interface Code (IWUIC), International Residential Code (IRC), and International Code Council Performance Code (ICCPC).</p>
National Fire Protection Association (NFPA) Codes	Per 40 U.S. Code § 3312, GSA has adopted the technical electrical requirements of the NFPA's National Electrical Code (NFPA 70).
	Per 40 U.S. Code § 3312, GSA has adopted the NFPA 101, Life Safety Code in lieu of the technical egress requirements of the IBC.
29 CFR 1926 Safety and Health Regulations for Construction	The design team must ensure that facilities can be constructed in a compliant manner.
29 CFR 1910 Occupational Safety and Health Standards	The design must ensure facility operations and maintenance can be performed in compliance with this section. The design must not subject building occupants to conditions in violation of these safety and health standards. (e.g. § 1910.146(b), Confined Space)
ANSI/ASSP Z10 - OSH Management	Mitigate safety/ health risks in order of precedence: hazard elimination; engineering controls; warning devices; and procedures and training.
29 CFR §1926.62 and 40 CFR §260	Addresses lead-based paint testing, management, abatement, and disposal, including in childcare centers.
29 CFR §1926.1101d	Per OSHA Construction Standard, presume that surfacing and thermal systems insulation in buildings constructed before 1981 contains asbestos unless proven otherwise. GSA considers materials replaced by non-asbestos

Section 1: GENERAL	
Name	Notes
	alternatives in 1981 or later and properly documented as exempt from this OSHA requirement.
National Emission Standard for Asbestos (40 CFR §61 Subpart M)	Pre-alteration assessments are required before construction or alteration to determine if asbestos will be impacted by the work. EPA Compliance Advisory
Interagency Security Committee Standard: Risk Management Process	Defines the criteria and processes facility security professionals should use to determine a facility's security level
Real Property Facility Design and Management 41 CFR Part 102-80	Safety And Environmental Management

Section 2: COMMUNITY PLANNING AND LANDSCAPING	
Name	Notes
Accommodating Federal Agencies	40 USC 3306 - Encourage Public Access
Clean Water Act, 33 USC §1251 et seq.	National Pollution Discharge Elimination System (NPDES) permit requirements related to Erosion and Sediment Control, Stormwater Pollution Prevention Plan, dewatering at construction sites, and stormwater / wastewater discharges.
	§404 requires permits for development impacting wetlands. Regulates discharge of fill material into other waters of the U.S. Encourages avoidance, minimization, and mitigation of wetland impacts.
American National Standards Institute (ANSI) standards	A300 American National Standard for Arboricultural Operations - covers best practices for tree planting, soil management, and risk assessment. Z60.1 American Standard for Nursery Stock and plant specification. C136 American National Standard for Roadway and Area Lighting Equipment - performance and safety standards for streetlights and pedestrian areas. ASABE S623 Determining Landscape Plant Water Demands/ irrigation sizing. ASABE S627 Weather-Based Landscape Irrigation Control Systems.
American Society for Testing and Materials (ASTM) standards	D4972 - test method for pH of soils. D5268 - standard specification for topsoil used for landscaping purposes.
Endangered Species Act 1973 (16 U.S.C. §§ 1531-1544)	Protects endangered and threatened species and their habitats, which can impact design

Section 3: ARCHITECTURE AND INTERIORS	
Name	Notes
Promoting Beautiful Federal Civic Architecture Memorandum	Federal public buildings should be visually identifiable as civic buildings and respect regional, traditional, and classical architectural heritage.
Wildland-Urban Interface (WUI) Federal Risk Mitigation (Executive Order 13728)	For new Federal buildings, and alterations to existing Federal buildings greater than 5,000 square feet, within the WUI and at moderate or greater risk to wildfire, Federal agencies must apply the wildfire-resistant design provisions outlined in the most current edition of the International Wildland-Urban Interface Code (IWUIC) promulgated by the International Code Council (ICC), or an equivalent nationally recognized code.
Section 2 of Governance and Integration of Federal Mission Resilience, 2020 (Executive Order 13961), National Security Memorandum-22 on Critical Infrastructure Security and Resilience	Incorporate resilience measures into real property investments that ensure Presidential Policy Directive 40 (PPD-40), National Continuity Policy, and the provisions of the Federal Continuity Directive (FCD) enumerated in 5 United States Code (U.S.C.) 101.
29 CFR §1926.501	Fall Protection
National Elevator Industry, Inc. (NEII)	Elevator cab sizes per NEII-1 Building Transportation Standards & Guidelines
40 USC § 3318	Lactation room requirements
40 USC § 3314	Baby changing facilities
Building Enclosures	
American Society for Testing and Materials (ASTM) Standards	E2813, Table A2.1 Standard Practice for Building Enclosure Commissioning; including mitigation against air, water infiltration (moisture, mold) and anchor pull strength of facade elements; supporting human health and safety
	E2947 Standard Guide for Building Enclosure Commissioning, in conjunction with E2813
	D7877 Standard Guide for Electronic Methods of Detecting and Locating Leaks in Waterproofing Membranes
	D8231 Standard Practice for the Use of Low Voltage Electronic Scanning System Detecting and Locating Breaches in Roofing and Waterproofing Membranes
National Roofing Contractors Association (NRCA)	Roofing Manual Waterproofing Manual

Section 4: STRUCTURE	
Name	Notes
American Society of Civil Engineers (ASCE) / Structural Engineering Institute (SEI) Standards	ASCE/SEI 7-22: Minimum Design Loads and Associated Criteria for Buildings and Other Structures including Supplements 1, 2 and 3
	ASCE/SEI 41-23: Seismic Evaluation and Retrofit of Existing Buildings
National Institute of Standards & Technology (NIST)	Standards of Seismic Safety for Existing Federally Owned and Leased Buildings; ICSSC Recommended Practice 10 (RP 10-22)
American Institute of Steel Construction (AISC)	Design Guide 11 : Vibrations of Steel-Framed Structural Systems Due to Human Activity (Second Ed. 2016) Revisions and Errata 2/16/2023
International Organization of Standards (ISO)	ISO 2631-2:2003 : Mechanical vibration and shock - Evaluation of human exposure to whole-body vibration, Part 2: Vibration in buildings (1Hz to 80Hz)
GSA Facility Security Requirements for Explosive Devices Applicable to Facility Security Levels III & IV	GSA's Interpretation of the ISC Risk Management Process
GSA Alternate Path Analysis and Design Guidelines for Progressive Collapse Resistance	

Section 5: MECHANICAL ENGINEERING	
Name	Notes
American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE)	All ASHRAE standards, guidelines and handbooks cited in the International Mechanical Code (IMC) shall be complied with in addition to the following:
	Standards 52.2; 55; 62.1; 111; 113; 135; 140
	Guidelines 0; 4; 12; 29; 44
ANSI Z223.1, National Fuel Gas Code	
American Society of Plumbing Engineers (ASPE)	Fundamentals of Plumbing Engineering, Plumbing Systems, Special Plumbing Systems, Plumbing Components and Equipment
Federal Data Enhancement Act	Standards for Data Centers fall under the purview of GSA's IT Modernization Division, within OGP, as directed in the Federal Data Enhancement Act.
Sheet Metal and Air Conditioning Contractors' National Association, Inc., (SMACNA)	All SMACNA standards cited in the International Mechanical Code (IMC) shall be complied with, in addition to: HVAC Air Duct Leakage Test Manual; HVAC Systems Testing, Adjusting & Balancing; HVAC Systems Testing, Adjusting & Balancing; Fire, Smoke and Radiation Damper Installation Guide for HVAC Systems; Seismic Restraint

Section 5: MECHANICAL ENGINEERING	
Name	Notes
	Manual Guidelines for Mechanical Systems; HVAC Systems Sound and Vibration Procedural Guide

Section 6: ELECTRICAL ENGINEERING	
Name	Notes
ASHRAE Standards	90.1: Lighting power density, automatic lighting control, automatic receptacle control, transformer efficiencies, and electrical energy monitoring (advanced metering)
IEEE (Institute of Electrical and Electronics Engineers)	IEEE 1584, Guide for Performing Arc-Flash Hazard Calculations IEEE C2, National Electrical Safety Code
UL (Underwriters Laboratories)	UL96, Lightning Protection Components UL96A, Installation of Lightning Protection Systems
ANSI/IES (Illuminating Engineering Society)	IES Lighting Library IES G-1, Guideline for Security Lighting for People, Property, and Critical Infrastructure IES RP-1, Lighting Offices Spaces IES RP-10, Lighting Common Applications IES RP-43, Recommended Practice for Lighting Exterior Applications
Building Industry Consulting Services International (BICSI) Telecommunications Distribution Methods Manual (TDMM)	Standard for design and installation of information and communications technology
NFPA (National Fire Protection Association) Codes and Standards	70, National Electrical Code 70E, Standard for Electrical Safety in the Workplace 101, Life Safety Code (Emergency & Egress Lighting) 110, Standard for Emergency and Standby Power Systems 111, Standard on Stored Electrical Energy Emergency and Standby Power Systems 780, Standard for Installation of Lightning Protection Systems 855, Standard for the Installation of Stationary Energy Storage Systems

Section 7: FIRE PROTECTION	
Name	Notes
National Fire Protection Association (NFPA) Codes and Standards	4, Standard for Integrated Fire Protection and Life Safety System Testing 13, Standard for the Installation of Sprinkler Systems

Section 7: FIRE PROTECTION	
Name	Notes
	14, Standard for the Installation of Standpipe and Hose Systems 20, Standard for the Installation of Standpipe Pumps for Fire Protection 24, Standard for the Installation of Private Fire Service Mains and Their Appurtenances 30, Flammable and Combustible Liquids Code 45, Standard on Fire Protection for Laboratories Using Chemicals 72, National Fire Alarm and Signaling Code 75, Standard for the Fire Protection of Information Technology Equipment 88A, Standard for Parking Garages 90A, Standard for the Installation of Air-Conditioning and Ventilating Systems 232, Protection of Records 241, Standard for Safeguarding Construction, Alteration, and Demolition Operations
Federal Fire Safety Act of 1992	15 USC § 2227

Section 8: CIVIL	
Name	Notes
EO 11988: Floodplain Management	Regulates federally-funded activities in or affecting the floodplain. This encompasses ALL permanent construction and other activities, including debris, roads, bridges, culverts, etc. The regulatory floodplain is defined by areas inundated by a 100-year or 500-year storm event. For most projects, any activities occurring in the 100-year floodplain will require analysis. For any activities associated with a critical action facility, such as a hospital or U.S. Court, the 500-year floodplain triggers this EO.
American Society of Civil Engineers (ASCE)	ASCE 24-24: Flood Resistant Design and Construction Standards
	ASCE 38-02: Standard Guidelines for the Collection and Depiction of Existing Subsurface Utility Data
EISA 2007	Sec. 438: All major capital projects with a scope of site work exceeding 5,000 shall manage the 95th percentile stormwater event onsite and reduce runoff. Reference: " Compliance with Section 438 (Stormwater) Requirements of the Energy Independence and Security Act of 2007 "
American Association of State Highway and Transportation Officials (AASHTO)	Policy on Geometric Design Highways and Streets (Green Book)

Section 9: SPECIALTY SPACES	
Name	Notes
U.S. Courts Design Guide (USCDG)	Functional program requirements; Court and court-related adjacency relationships; accessibility; finish materials; performance criteria for acoustics; environmental systems (including special HVAC and lighting requirements); security; telecommunications; and audio-visual design.
MOA for Court Security 2019	
U.S. Courts Courtroom Technology Manual	Reference is made to these systems only regarding the electrical service requirements in the areas where they are being installed.
Requirements and Specifications for Special Purpose and Support Space Manual (USMS Publication 64)	Criteria for USMS functional program requirements, spatial relationships, electronic and physical security, and hardware standards and special HVAC requirements within the U.S. Courts and court-related spaces.
NASA Facilities Design Standard	
United States Land Port of Entry Design Standard	
GSA Federal Courthouse Physical Security Best Practices Desk Guide 2023	
GSA Mail Center Security Guide 5th Edition	
GSA Indoor Firing Range Policy and Criteria	
GSA Indoor Firing Range Cyclical Maintenance and Repairs Memorandum	
Interagency Security Committee Appendix C: Child Care Level of Protection Template (FOUO)	Also use Child Care Center Design Guide (PBS-P140)