



Mr. Ken Sandler
Designated Federal Official
Office of Federal High-Performance Green Buildings
Office of Governmentwide Policy
General Services Administration (GSA)
1275 First Street, NE, Room 633D
Washington, D.C. 20417

via email: ken.sandler@gsa.gov

November 17, 2011

Dear Mr. Sandler:

We have just been made aware of the opportunity to comment on GSA's "Green Building Certification System Review" project following GSA's November 9, 2011 public meeting of the *Green Building Advisory Committee to GSA*. Realizing the deadline is Monday, November 21st our comments are direct and succinct. We are happy to discuss any of the topics in these comments at your request.

As background, these comments are submitted on behalf of the Flexible Vinyl Alliance, or FVA. FVA was formed in 2009 as an independent, informal coalition of more than 100 business concerns including trade organizations, raw materials suppliers, compounders, formulators, molders and fabricators representing the full value chain of the flexible poly-vinyl chloride (PVC) product market, which in the United States represents a \$20B industry.

As you are aware, flexible vinyl products are essential to commercial, military, building and medical markets. In buildings, flexible PVC is found in wall coverings, resilient flooring products, roofing, wiring and cable, and in furniture and upholstery. All federal facilities feature, and benefit from, the affordability, durability, safety, energy conservation features, aesthetic appeal and sustainability of flexible vinyl building products. Flexible vinyl products have been used safely and effectively for over 60 years.

Standards for choosing building materials and designs including the "green building" certification standards employed by GSA should utilize full Life Cycle Assessment (LCA) tools in making decisions on the relative merits of building systems and materials. Such tools provide transparent, quantitative, full and fair consideration of costs, benefits and environmental impacts of materials from manufacture, use and end-of-life.

In addition, any standard chosen by GSA for incorporation by reference should be consensus-based, and developed according to processes developed by the American National Standards Institute (ANSI).

We therefore support GSA's efforts to set objective, **performance-driven criteria** against which building impacts, and in fact, certification systems will be measured. Perhaps the best current standard meeting the aforementioned criteria is the Green Building Initiative's *Green Globes*. FVA recognizes that the U.S. Green Building Council's LEED standard is also widely used even though it falls short on some of those criteria.

However, adoption of the *Living Building Challenge (LBC)* as an adjunct certification standard to USGBC LEED and *Green Globes* moves in exactly the **opposite** direction of good policy. LBC is not life-cycle based, nor was it developed under the normal rubrics of consensus-standards creation. It demotes the inherent, favorable performance/cost benefit criteria of vinyl in favor of an anti-material bias that does not serve the objectives of GSA, in FVA's opinion

An example of this misguided approach is the Living Building Challenge's "Red List," essentially an arbitrary "do not use" list of materials, including flexible vinyl among other things. The LBC approach completely undermines the value of an LCA approach, because LCA fully considers the advantages and disadvantages of **all** building materials, based on measurable criteria, not hearsay or so-called "press release science." Materials avoidance approaches, such as LBC's remove options **before** they can be evaluated and considered, thus reducing flexibility and innovation in buildings systems.

GSA's portfolio includes more than 9,600 properties for 1.1 million Federal employees at 400 agencies, commissions and bureaus. In 2009, the Agency procured goods, services, and workspace valued at \$62 billion. These are substantial holdings, fully deserving of the best, highest and most efficient building standards, and the best ROI for the taxpayer. We support fair competition in green building standards to achieve this goal.

The Living Building Challenge does **not** meet these criteria. And, until such time as the Living Building Challenge becomes a fully life-cycle based, consensus standard it should not be considered by GSA.

The Flexible Vinyl Alliance thanks you for this opportunity to express support for sound, basic, sustainable design principles for federal buildings.

Respectfully Submitted by Kevin D. Ott, on behalf of:

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