



Flexible Vinyl Alliance

September 14, 2015

To: Office of Federal High-Performance Green Buildings; Development of Model Commercial Leasing Provisions (Notice MG-2015-04)

Re: Comments of the Flexible Vinyl Alliance

September 14, 2015

To Whom This May Concern:

Thank you for this opportunity to comment on Notice MG-2015-04.

FVA is a coalition of trade organizations, materials suppliers, compounders, formulators, molders and fabricators of flexible vinyl products.

FVA provides messaging and advocacy on the proven safety, economy and utility of flexible PVC, a material used in a wide range of health care, recreational, military, automotive, building, roofing, flooring, construction and packaging applications for more than 50 years. FVA operates as an Affiliate of SOCMA, and is based in Washington, DC.

Previously, in its own comments to GSA of May 9, 2012 and again on June 29, 2013, FVA stated that “government needs to be a good steward and a smart consumer of ‘eco-friendly’ choices, and competition (among green building standards used by government) is warranted.....” In both these testimonies, FVA touted Green Globes® as a system in the United States that aligns with more of the federal sustainability requirements than any other green building rating system for new construction.

In that same vein, FVA now requests that the Model Commercial Leasing Provisions document cited here be updated to reflect the conclusion that **both**

LEED® and Green Globes as suitable for use as green building certification programs by federal agencies.

The document cited here makes several references to LEED but neither includes GBI's Guiding Principles --- Green Globes -- nor provides language that equivalent systems to LEED *could* be used.

You will recollect that the General Services Administration recognized GBI/Green Globes alongside the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) as the **two** recommended third-party certification systems for the federal government to use to gauge performance of its buildings. The recommendation was made in a letter of October 25th, 2013 addressed to Dr. Ernest Moniz, United States Secretary of Energy.

From the GSA Press Release of October 25, 2013, we cite:

“In its recommendation to DOE, GSA recommended the Green Building Initiative's Green Globes 2010 and the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) 2009 as the third party certification systems that the federal government can use to gauge performance in its construction and renovation projects. Other certification systems were not selected because they did not align with the government's requirements. Additionally, under today's recommendation, GSA will conduct more regular reviews in order to keep up with the latest green building tools that the market has to offer. “

In closing, and in further recommending GBI, it remains the only commercial building rating system developer to vet its technical criteria through the ANSI process, which sets it apart from **all** other green building systems. This helps to ensure that GBI's rating systems provide the opportunity to evaluate the widest range of buildings using an open, science-based approach to building performance.

GBI's tools have a significant focus on both the reduction and efficient use of energy and water in buildings. These, along with other criteria, help reduce building operating costs and their overall impact on the environment.

GSA's Model Commercial Leasing Provisions should be updated to reflect that Green Globes (and perhaps other systems other than just LEED) are suitable for

use as green building certification programs by federal agencies. Green Globes certainly is one.

Thank you for this opportunity to comment, and your consideration of our request for amendment to the GSA recommendation.

Submitted on Behalf of the Flexible Vinyl Alliance by:

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