



**International Code Council**  
500 New Jersey Avenue, NW  
Sixth Floor  
Washington, DC 20001  
tel: 888.icc.safe (422.7233)  
fax: 202.783.2348  
www.iccsafe.org

**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**

**Contact:**  
**David Karmol, [dkarmol@iccsafe.org](mailto:dkarmol@iccsafe.org)**

The International Code Council (ICC) offers the following comments on the Request for Information, Docket No. GSA-GSA-2014-0002-0015, published on January 15, 2015.

The International Code Council (ICC) is a U.S.-based membership association. It is dedicated to developing model codes and standards used in the design, build and compliance process to construct safe, energy-efficient, sustainable, affordable and resilient structures in the built environment. The International Codes, or I-Codes, published by ICC, provide minimum safeguards for people at home, at school and in the workplace. Building codes benefit public safety and support the industry's need for one set of codes without regional limitations. Among the codes published by ICC is the International Energy Conservation Code (IECC), which is referenced in the Energy Conservation and Production Act (ECPA, Public Law 102-486), and the Energy Independence and Security Act (EISA) of 2007. ICC also publishes the International Green Construction Code (IgCC), which contains energy efficiency, water efficiency, air quality, siting and location considerations and sustainability provisions.

All 50 states and the District of Columbia have adopted at least one I-Code at the state or jurisdictional level. Federal agencies including the Architect of the Capitol, General Services Administration, National Park Service, Department of State, U.S. Forest Service and the Veterans Administration also enforce the I-Codes for the facilities that they own or manage. The Department of Defense references the International Building Code for constructing military facilities, including those that house U.S. troops, domestically and abroad.

ICC was established in 1994 as a non-profit organization dedicated to developing a single set of comprehensive and coordinated national model construction codes. The founders of the ICC are Building Officials and Code Administrators International, Inc. (BOCA), International

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 Federal agencies to achieve Federal efficiency goals.

Likewise, we believe that, consistent with OMB-A-119 guidance, GSA should fully participate in the development of consensus codes, standards and other private sector building rating systems which may be used by Federal agencies in the design, construction, and management of Federal office and other commercial and residential real estate. ICC appreciates the involvement of GSA technical experts and facility managers in our code development process, and notes that such involvement results in codes that are more usable and user friendly for Federal agency users of the Codes.

We appreciate GSA's leadership in advancing a more efficient built environment and look forward to continuing to work with the agency in advancing this important priority.