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June 22, 2012

Acting Administrator Daniel M. Tangherlini
U.S. General Services Administration
GSA Office of the Administrator
1800 F Street, NW
Washington, DC 20405

Dear Acting Administrator Tangherlini,

I offer the following comments for your consideration as GSA gathers input on its recently published evaluation of green building certification systems. I urge you to consider the following points:

1. GSA should not arbitrarily select winners and losers.
2. GSA should fully embrace the concept of consensus.
3. GSA should make cost-savings a top priority.

GSA's current policy of only using U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) does not provide an equitable system to certify green buildings. Specifically, GSA's LEED policy does not take into account the full environmental benefits of wood products, which are thoroughly supported by science. Furthermore, recent proposals to eliminate the use of approved materials and proven products under new Materials and Resources credits would undermine efforts to improve energy efficiency. Use of this rating system effectively results in GSA's picking winners and losers for green building construction.

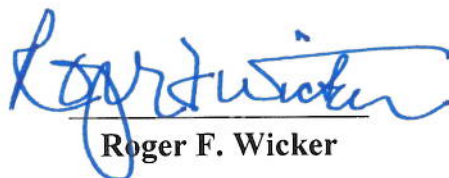
The Green Building Certification Review completed by Pacific Northwest National Laboratory, fails to reflect the critical need to utilize consensus-based standards. In areas of public health, safety, and environment, the federal government already relies on well-established independent standards organizations to develop relevant and reliable standards.

Specific examples include the National Fire Protection Association, ASTM International, and the American Society of Mechanical Engineers. These organizations develop voluntary consensus standards using procedures that are accredited for transparency, balance of interests represented, and consensus decision-making by the American National Standards Institute (ANSI). Greater emphasis should be placed on standards and rating systems for green buildings which are ANSI accredited. This will ensure that all interested stakeholders can be a part of the standard development process – a key issue that LEED does not address.

Finally, LEED is not a cost efficient policy for the construction and operation of energy-saving buildings. It is imperative for GSA to adopt a green building policy that spends taxpayer dollars responsibly while holding energy and water efficiency as its primary objective. The selected policy should be based on a broader goal to cut the current costs associated with construction and maintenance of federal buildings, while further protecting the environment. GSA's use of LEED simply goes against the principles of responsible government.

It is my hope GSA adopts standards for green buildings that are fair and consensus-based, using materials and technologies that are cost-efficient, commercially available, and improve the environment. Please do not hesitate to contact me if you have any questions regarding my views on this issue. Thank you for your continued efforts to achieve energy efficiency for federal buildings.

Sincerely,



Roger F. Wicker