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International Facility Management Association

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The U.S. Green Building Council is seeking feedback on the [next version \(v5\) of the Leadership in Energy and Environmental Design \(LEED\) program](#). IFMA is asking you to [provide comments on LEED for Existing Buildings \(LEED EB\)](#). IFMA's suggested comments for each credit category are below for your reference (page numbers in the LEED EB draft are noted). You may copy each comment directly into your submission, edit as you deem appropriate or provide your own wording. Comments must be submitted by May 20, 2024.

Comment 1:

Location and Transportation (LT) – Public Comment Draft, Page 10

Granted a maximum of 10 points, this credit category is overweight, given that an existing building has no control over its location and minimal control over transportation alternatives. The *Transportation* credit/points unfairly benefit urban areas with robust public transportation infrastructure. Rural areas typically do not yet have low-carbon transportation options or pervasive electric vehicle charging, which puts these points out of reach. The most transient element of a building is its occupants, so an *Occupant Travel Survey* has minimal longevity. As indicated, an existing building has no control over its *Location-efficiency Score*. As transportation is largely external to the actual subject of the rating, the building itself, this credit category should be allocated no more than 5 to 7 points in total.

Comment 2:

Sustainable Sites (SS) – Public Comment Draft, Pages 14 & 8

There are no basic concerns with the *Sustainable Sites* credit category, as the credit/points are all within the building sphere of control. The credit category may be underweighted at 2 points. *Rainwater Management*, *Heat Island Reduction* and *Light Pollution Reduction* all provide long-term benefits, and perhaps an increase in points would provide a more significant incentive to pursue this credit/points. This



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category fails to acknowledge the operation labor force required to maintain stormwater systems and landscaping. Two (2) points allocated to prerequisites for *Equity Within Operations and Maintenance Staff* is insufficient.

Comment 3:

Water Efficiency (WE) – Public Comment Draft, Page 17

From an operations perspective, we believe the *Water, Energy, Waste* and *IEQ* credit categories should have a more balanced point allocation. With increasing concerns over access to fresh water, the *Water* category should carry a higher point value to incentivize greater water efficiency and performance. Many climate risks threaten access to, or pollution of, available freshwater supplies – yet the resilience strategies barely address freshwater access. The credit/points should emphasize overall water efficiency rather than simply measuring wasted water. The credit/points should be increased from 14 to 20 and reevaluated to provide more recognition of water efficiency in addition to water use intensity.

Comment 4:

Energy and Atmosphere (EA) – Public Comment Draft, Page 19

While *Energy* is an important credit category, it is overweighted from an operations perspective. Many points are allocated to transactional/one-time events such as *Decarbonization & Efficiency Plans* or *Renewable Energy*. When measuring performance year over year, why would we continue to allocate the same credit/points to these items? Moving forward, decarbonization will become increasingly dependent upon the adoption of circular economy principles (see: *Materials and Resources*). Simply having policies and plans is no guarantee of ongoing performance; so, LEED EB should emphasize actual performance over policy intent. The prerequisites for *Energy, Carbon and Operational Foundations* are acceptable, but the allocation of 37 points to this credit category is overweight. The



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credit categories should be reevaluated to emphasize measurable performance over documenting plans or future state activities, such as grid interactivity for which no reliable timeline is available. The *Energy Performance and Commissioning* credit should focus on rewarding continuous commissioning technologies (persistent, real-time monitoring) over transactional, one-time events such as traditional commissioning or retro-commissioning processes. While EA is a vital category from a decarbonization perspective, it should be allocated no more than 25 points.

Comment 5:

Materials and Resources (MR) – Public Comment Draft, Page 42

This credit category is underweighted from an operations perspective. More attention should be focused on adopting circular economy principles over simple waste disposal strategies. The shift to a circular economy requires rethinking, retraining, reframing and re-educating. The three main principles of the circular economy are: 1) eliminate waste and pollution; 2) circulate products and materials at their highest value; and 3) regenerate nature. The *Embodied Carbon of Interior Materials During Renovation* points fail to recognize the substantial embodied carbon associated with all materials/consumables used in day-to-day operations. This category needs more incentives to address carbon and waste incurred in daily operations. The 9 points allocated to this credit category should be increased to 20. The credits should be reevaluated to incorporate more recognition for materials and supply chain management in operations in addition to waste disposal.

Comment 6:

Indoor Environmental Quality (EQ) – Public Comment Draft, Page 45

While the total of 20 points for this category is adequate, it is overweighted toward the *Indoor Air Quality Performance and Occupant Satisfaction Survey*. How much weight should an occupant satisfaction survey place on indoor environmental



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quality when most occupants do not have a solid understanding of the elements that make up environmental quality? While *Indoor Air Quality* is certainly one of those components, it is overweight for this category from an operations perspective. More recognition is needed for *Green Cleaning* and *Integrated Pest Management* as ongoing operational contributors to IEQ. *Green Cleaning* is an equal contributor to IEQ by ensuring a pollution-free indoor environment and minimizing bacterial, viral and other contaminants that threaten occupant health year over year. Likewise, *Integrated Pest Management* minimizes threats from disease-bearing rodents and insects. It is suggested that *Indoor Air Quality* be allocated 9 points, *Occupant Satisfaction Survey* be allocated 1 point, *Green Cleaning* be allocated 5 points, and *Integrated Pest Control* be allocated 5 points. This leaves the category point total unchanged at 20.

Comment 7:

Project Priorities & Innovation (IN) – Public Comment Draft, Page 59

The term “*Project Priorities*” implies transactional activities. There is no recognition of operational activities. As this credit category represents an opportunity for an additional 10 points, it should be balanced between *Project* and *Operational Innovations*. As written, the credit/points give no acknowledgment or options for innovations in operations. The options for this category should be reevaluated to allocate at least half of the credit/points to operational innovations.