

Responses to General Section Comments on LEED-EB Comment Draft 2 (Updated August 30, 2004)

Category	Comment #	Credit	Submitted By	Organization	Likes and Dislikes	Ways To Improve	Language Changes	Proposed Response	Proposed change to LEED-EB for the Ballot Draft	Type of Change
LEED-EB General Comments	Gen-Com1	NA (LEED-EB General Comments) --- Added IEQ Prerequisite	scottsimons (Scott Simons)	Scott Simons Architects	I think a IEQ prereq should be the requirement to remove or encapsulate lead paint. The section format could be very similar to what is used for asbestos. Here in the northeast, which has an older building stock, lead paint is a very common problem.	Increase the safety of the building environment, especially for children.	Language Changes The health related issues with lead paint are well documented especially in regards to children. Testing, encapsulation or removal standards are in place by several government agencies. These appropriate standards could be referenced in LEED EB.	The addressing of lead paint will be considered in a future revision of LEED-EB.	None	None
LEED-EB General Comments	Gen-Com2	NA (LEED-EB General Comments) --- IEQ Credit 7.1	Idoty (Steve Doty)	Colorado Springs Utilities	IEQ IEQ Credit 7.1 (thermal comfort) is not on the list of commentable items, but is in the draft text as being part of the rating system, so I put the comment there. I would move it to section 7.1 so other reviewers can see it. Thank! *** Weakness: The reference to ASHRAE standard 55-2004 appears incorrect. From the ASHRAE website, the standard 55-1992 was placed on continuous maintenance in 2004. In a telephone call to an ASHRAE member involved with standards review, this standard is in the process of being overhauled, is reportedly not ready for public release, and no projected date for release was given. Weakness: the existing standard does not make any allowance for occupant acclimation to prevailing local weather conditions, such as Hawaii (humid) or Colorado (dry). For the example of Colorado, people generally have become accustomed to the dry climate and tolerate and accept it without humidifiers. Psychrometric analysis shows that the outside air introduced for occupants will create a drying condition and the Standard 55 requisite level of 30% RH minimum cannot be achieved without a humidifier. Still, sta	Amend the reference to the ASHRAE Standard 55 for current date Allow an exception to humidification to add humidity to the building, where the local standard design practice and standard of care does not require it. This will avoid unnecessary use and cost of humidifiers, unnecessary complication of building operations, unnecessary energy use, and greater following of this particular credit, while maintaining reasonable comfort. For quality purposes, have this Letter template stamped by a registered engineer in that state, so there is credibility in asserting that the local standard of care is being met.	Requirements Comply with ASHRAE Standard 55 LATEST VERSION, Thermal Comfort Conditions for Human Occupancy. Exception: WHERE LOCAL DESIGN PRACTICE AND STANDARD OF CARE DOES NOT REQUIRE IT, THE USE OF HUMIDIFICATION EQUIPMENT TO MAINTAIN THE LOW HUMIDITY LIMIT OF STANDARD 55 IS NOT REQUIRED IN ORDER TO ACHIEVE THIS CREDIT. THE PROVISIONS OF STANDARD 55 FOR HIGH HUMIDITY CONTROL ARE REQUIRED IN ANY CASE TO ACHIEVE THIS CREDIT. Submittals Provide the LEED-CI Letter Template, signed by the engineer or responsible party, declaring that the project complies with ASHRAE Standard 55 LATEST VERSION, WHERE EXCEPTION IS TAKEN FOR THE USE OF HUMIDIFICATION EQUIPMENT TO MAINTAIN MINIMUM INDOOR HUMIDITY LEVELS. THE LETTER TEMPLATE MUST BE SIGNED AND SEALED BY A REGISTERED MECHANICAL ENGINEER IN THAT STATE CERTIFYING THAT THE LOCAL DESIGN PRACTICE AND STANDARD OF CARE DOES NOT REQUIRE HUMIDIFIERS FOR ACCEPTED LEVELS OF COMFORT. Include documentation of compliance according to ASHRAE Standard 55 LATEST VERSION.	This was not included in the commentable items because it was not significantly changed from LEED-EB comment draft 1. Change requirements so requirement refers to ASHRAE 55-2004 specifically, rather than "latest version and remove humidification exception from requirements and from submittals.	Make changes in Proposed Response.	Clarification
LEED-EB General Comments	Gen-Com3	NA (LEED-EB General Comments)	wesler (William Suter)	American University	I think that in some way LEED needs to acknowledge that an existing building has received all of the points it qualifies for. There are some existing buildings that cannot qualify for some points because of their location/orientation/constructive; but if a building is awarded all of the points for which it qualifies, this should be pointed out. There will be some buildings who only qualify for 50% of the points and if the building actually gets all of the points it has in fact received 100% of the points for which it qualifies	see above	see above	In LEED-EB and other LEED rating systems it is a very common situation that a particular project cannot earn various points. LEED-EB is designed to be a fixed reference point so the number of points earned indicates how far along the path to sustainability the building has moved.	None	None
LEED-EB General Comments	Gen-Com4	NA (LEED-EB General Comments) --- SS Credit 7.2 Heat Islands Reduction	yarbrough (David Yarbrough)	R&D Services, Inc.	SS Credit 7.2 Heat Islands Reduction - Roof Weakness 1. Emphasizes reflective roof reflectance 2. Identifies ASTM E 408. Limited availability. Strength if properly structured will reduce cooling loads.	Changes to SS credit 7.2 1) Change: specify total hemispherical emittance measured in accordance with ASTM C 1371 or normal emittance measured in accordance with ASTM E 408. 2) Require emittance minimum of 0.8 3) Require initial solar reflectance minimum of 0.8 4) Require aged solar reflectance minimum of 0.6	Requirements: line 2 minimum emittance of 0.8 when tested in accordance with ASTM E 408 or ASTM C 1371. Submittals: minimum initial reflectance of 0.8, a minimum three year aged reflectance of 0.6 and a minimum emittance of 0.8 (emittance is used for actual surfaces, emissivity is used for pure materials). The basis for my proposed changes come from use of ASTM E 1980. Results could be attached but there is no provision for this in your procedure. E 1980 results in a value for SRI (Solar Reflective Index). The higher the SRI the more the predicted reduction in cooling load. The example results which follow indicate that solar reflectance is the strong variable and emittance is a weak variable. Hc =+5 Solar Ref Emittance SRI 0.65 0.8 74.7 0.65 0.85 76.6 0.65 0.9 78.5 0.8 0.8 97.0 0.80 0.85 98.2 0.80 0.9 99.3 Similar results are obtained for HC =12 and HC >30. HC is related to the wind velocity. It is the surface heat transfer coefficient.	Reflectance is addressed by the referenced EnergyStar Standard.	None	None
LEED-EB General Comments	Gen-Com5	NA (LEED-EB General Comments)	watson (Robert Watson)		There are typos and missing or extra words throughout. Make sure the draft is proofread before releasing for ballot.	Quality of the document.	Proofreader will catch them.	Document will be proofread for typographical errors before it is sent out for ballot.	None	None
LEED-EB General Comments	Gen-Com6	NA (LEED-EB General Comments) --- EA Credit 4	mandyck (John Mandyck)		Regarding EA4 (p.80), LEED should not recognize HCFC-123 under the ozone protection credit. HCFC-123 is an ozone depleting substance that will be banned in the U.S. under the Clean Air Act. All nations are eliminating the use of ozone depleting substances, including HCFC-123, under the Montreal Protocol. The European Union has already banned HCFC-123 in new equipment. Ozone depletion remains a critical issue for our planet, which experienced record ozone loss in the past 12 months. Additionally, new reports (NHA Journal, January 2003) suggest the toxicity of HCFC-123 may be currently understated.	EA4 should be limited to non-ozone depleting refrigerants only.	Eliminate draft text on page 60 that states: "provide documentation that all existing base cooling equipment for the building that used CFC-11 have had this refrigerant replaced with HCFC-123."	This language has been removed. It was added in error. The LEED-EB Rating System will be revised according to the findings of final TSAC refrigerant report upon its release. Until that time, it will follow credit requirements consistent with LEED-NC version 2.1.	make editorial change.	Editorial
LEED-EB General Comments	Gen-Com7	NA (LEED-EB General Comments)	LewisJohnson (Lewis Johnson)	University of Florida	There are many original standards of performance in this document. Many of these requirements are not fully thought out, or are impossible to implement in a reasonable manner. A better approach would be to reference existing ANSI, ISO, ASTM, EPA, ACGIH, ASHRAE, BOMA, etc standards where possible.	Whenever possible require compliance with existing consensus or regulatory standards.	See above.	Generally where existing standards are identified that achieve the specific objective desired, these standards are referenced in LEED rating systems. LEED rating systems also frequently sets the requirements for credits and prerequisites without referencing other standards.	None	None
LEED-EB General Comments	Gen-Com8	NA (LEED-EB General Comments) --- MR Cleaning Product Credits, IEQ Cleaning Credits	pryce (Steve Pryce)	Steelcase Inc.	1. The documentation and record keeping for some of the credits is excessive. This may greatly increase cost and may deter some organizations from entertaining LEED EB certification. 2. There are 8 points available based on cleaning materials, methods, equipment. That weighting is not justified by the impact.	1. Reduce audit frequencies to semi or annual. Reduce submital of materials if they will not be reviewed by USGBC. 2. Eliminate frivolous points in the cleaning categories, to 3 total for cleaning related. Add point categories for use of reusable architectural systems that reduce resource use, landfill volumes and transportation emissions.	See above. Reduce points for cleaning related. Add a credit for use of reusable architectural materials and systems.	(a) Cleaning has a significant impact on IAQ and will be retained. (b) Add to requirements section a statement that: "For reusable architectural panels, each time they are moved and reinstalled they can be counted as part of the total waste stream and included in the recycled component of the waste stream." (c) Quarterly reporting is important for achieving sustainability in buildings on an ongoing basis and will be retained. See response to Comment SSC4.2-Com1 in the Sustainable Sites section or responses to other comments.	Make changes in Proposed Response.	Clarification
LEED-EB General Comments	Gen-Com9	NA (LEED-EB General Comments) --- LEED-EB SS Credit 7.2	grawford (Gregory Grawford)	Steel Recycling Institute	Comments are now "restricted" to areas with substantive changes but LEED-EB SS Credit 7.2 remains very weak because as 0.8 emissivity requirement is excessive. Earlier comments (E3, E4, E6) described 0.8 as too high but they were seemingly ignored and no rationale was given in the "summary of responses to individual comments." This threshold precludes use of cool metal roofing. ASTM C1371 was omitted.	Draft LEED-EB SS Credit 7.2, updated June 10, 2004, uses language from LEED-NC 2.1 although draft LEED-NC 2.2 proposed using solar reflective index (SRI), which is inconsistent. Change the emissivity requirement to 0.7, include ASTM C1371. Do not use SRI. This would allow use of cool metal roofing that ORNL shows to retain excellent reflective and emissive properties over a very long service life.	"Have in place over the performance period ENERGY STAR® compliant, high reflectance, and high emissivity roofing material which has a minimum emissivity of 0.7 when tested in accordance with ASTM 408 or ASTM C1371 for..."	This topic was not included in the commentable items because it was not significantly changed from LEED-EB Comment Draft 1. LEED-EB is following the lead of LEED-NC on this credit. Once LEED-2.2 is approved, LEED-EB will adopt the standards for new roofing for the Roof - Heat Island credit included in LEED-NC 2.2.	None	None
LEED-EB General Comments	Gen-Com10	NA (LEED-EB General Comments)	inhalstern (Michelle Hale Stern)	The Delta Institute	found the standard to be good conceptually, but felt some areas needed clarification both for the ease of the reviewers and the implementers. There was inconsistency in language between NC, CI, and EB on similar credits. In some credits items listed under submittals should have been listed under the requirement section.	SS C1, EA CS.4 should be more specific. For example what constitutes a good exterior maintenance plan, are there baselines? Is there an example of a 3rd party certification program for emissions retirement (and please define retirement) similar to Green-e? Under EA 8 cost impact should be controlled if possible for changes temperature and occupancy hours. Under EA 10.1 and 10.4 the strategies and submittals responses should be part of the requirements. Is there any standard for IPM that can be referenced?	Use the daylighting definition from C.1. of footcandles for IEQ 8.1	(1) EACredit4.5: See response to Comment Gen-Com19. (2) EA Credit 6: None (3) For EA Credits 10.1 and 10.4, the strategies and submittals will be kept separate from the submittals and strategies to keep the formatting consistent with the rest of the LEED-EB. (4) IPM resources will be provided in the LEED-EB Reference Guide. (5) Daylighting: LEED-EB uses the same definitions and calculation methodology as LEED-NC.	None	None
LEED-EB General Comments	Gen-Com11	LEED-EB General Comments --- EA Credit 2.1 - 2.4	Isoldi (Thomas Stoddard)	NativeEnergy	There is considerable weakness in the inconsistency between CI EA2 and EB EA2.1 - 2.4 - the green power credits in their respective categories. This inconsistency severely hampers the market transformation impact of LEED, especially when it is in an area like green power that affects the entire renewable energy industry. In addition, in the rapidly evolving renewable energy market, overly narrow eligibility requirements (like the Green-e certification only) severely limit ongoing innovation in the green power market, to the detriment of renewables development.	Make all green power eligibility requirements the same throughout the LEED system, and open them up to all legitimate green power/certificate products, not just the one model certified by CRS.	See NativeEnergy's comments on the specific credits, as well as NativeEnergy's letter to Brendan Owens e-mailed July 10, 2003, as supported by a letter to the USGBC from Dale Bryk on behalf of NRDC.	See response to Comments for EA2:1-2.4 in EA section of responses to comments.	None	None
LEED-EB General Comments	Gen-Com12	LEED-EB General Comments --- EA Credit 3.2	lyneichnerkell (Lynne Echnier Kelley)	City of Eugene-Facility Management Division	I don't find any specific reference to the overall integrity of the building shell. A leaking building is neither healthy or sustainable! SS Credit 7.2 LEED, especially when it is in an area like green power that affects the entire renewable energy industry. In addition, in the rapidly evolving renewable energy market, overly narrow eligibility requirements (like the Green-e certification only) severely limit ongoing innovation in the green power market, to the detriment of renewables development.	Add a prerequisite to specifically address adequate maintenance of roof, window, door, insulation and exterior cladding systems to prevent water and air infiltration and thus damage to structure and materials.	Make EA credit 3.2 a prerequisite and expand to address this issue, or include in MR or IEQ category.	The 10 credits for energy performance provide a strong incentive for all aspects of energy efficiency including building shell integrity and insulation level. The LEED-EB Reference Guide will include information on the importance of building shell integrity and insulation levels for achieving high levels of energy efficiency.	None	None
LEED-EB General Comments	Gen-Com13	NA (LEED-EB General Comments)	Drew-Alton (Lisa Drew-Alton)		Why isn't every category listed so that credits can be made. I had several comments for prerequisites and credits not listed.	N/A	N/A	Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from the LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004.	None	None

LEED-EB General Comments	Gen-Com14	LEED-EB General Comments --- EA Credit 4, IEO Credit 2	hsachs (Harvey Sachs)	ACEEE	I have attempted to submit comments on EA Credit 4, and on IEO Credit 2, but the forms at https://www.usgbc.org/LEED/Drafts/drafts_lead_system.asp?SYSTEM_ID=44&CATEGORY_ID=39 did not allow comments on these two. Accordingly, per conversation with Nigel Howard, I am submitting these in the form of a letter to B. Owens, thanks Harvey Sachs	I have attempted to submit comments on EA Credit 4, and on IEO Credit 2, but the forms at https://www.usgbc.org/LEED/Drafts/drafts_lead_system.asp?SYSTEM_ID=44&CATEGORY_ID=39 did not allow comments on these two. Accordingly, per conversation with Nigel Howard, I am submitting these in the form of a letter to B. Owens, thanks Harvey Sachs	I have attempted to submit comments on EA Credit 4, and on IEO Credit 2, but the forms at https://www.usgbc.org/LEED/Drafts/drafts_lead_system.asp?SYSTEM_ID=44&CATEGORY_ID=39 did not allow comments on these two. Accordingly, per conversation with Nigel Howard, I am submitting these in the form of a letter to B. Owens, thanks Harvey Sachs	The specific comments will be addressed where they are provided.	None	None
LEED-EB General Comments	Gen-Com15	N/A (LEED-EB General Comments)	crystalidm (Crystal Melino)	Sebasta (Bromberg & Associates)	Currently O&M departments are under-funded and this level of documentation will add an unnecessary burden while achieving the goal of documentation.	Using the lessons learned from LEED-NC a streamline documentation process needs to be developed.	Documentation requirements should be changed to 'annually' or 'yearly'.	Tracking and documenting performance is an important part of maintaining sustainable building performance over time. Quarterly reporting templates and online reporting tools will make this easier for LEED-EB participants. See response to Comment EA2.1.2.4-Com1.	None	None
LEED-EB General Comments	Gen-Com16	LEED-EB General Comments --- EA Prereq 1	Higgins (Joseph Higgins)		EA-Pre-requisite 1 Existing Building Commissioning The notion of a 1-5 year implementation timeframe may smooth the initial cost issue, however, one can also say that it only serves to let folks 'off the hook' from getting their buildings to work efficiently prior to putting the 'green' plaque on the building. Knowing that existing buildings typically use 10-30% more energy than required, it seems perfectly logical that the expectation should be that those seeking LEED-EB get the energy systems working efficiently before certification is granted.	Suggestions: 1. Limit systems to be commissioned to just the main energy consuming systems (not safety, water etc.) 2. Remove the 1-5 year implementation plan.	Suggest changing Pre-requisite title to "Validate Energy Systems Performance"	LEED-EB is about measured delivered performance. The 10 points for energy performance provide a strong incentive to achieve high levels of energy performance. The required schedule for implementation for building commissioning for existing buildings guides the building improvement over this period and building energy efficiency as well as the energy efficiency points earned reflect the actual achievements.	None	None
LEED-EB General Comments	Gen-Com17	N/A (LEED-EB General Comments)	igoyile (Tom Genovese)	EME Group	2 items that are not yet adequately represented in the system are: 1) incorporation of mixed-use in or near the building, to reduce the required transportation of people and resources; 2) tenant accountability for energy usage -- metering and charging tenants separately for energy consumption has a significant effect on their consumption habits.	N/A	N/A	(1) incorporation of mixed-use in or near the buildings, to reduce the required transportation of people and resources. Response: This will be addressed in the application guide being developed called LEED for neighborhoods. (2) tenant accountability for energy usage -- metering and charging tenants separately for energy consumption has a significant effect on their consumption habits - Response: LEED-EB is primarily focused on single occupant buildings. In the future, an application guide for LEED-EB that addresses multi tenant buildings will be developed.	None	None
LEED-EB General Comments	Gen-Com18	LEED-EB General Comments --- MR Credit 1.2	Sarafati (Brian Whelan)	Sarafati Inc.	N/A	Materials and Resources. No longer any reference to material recycling. We believe that credit should be provided for using products that come from companies that can document a 100% material production yield (any scrap or waste generated during manufacturing process is recycled internally). This would reward plant quality and efficiency and reduce scrap to landfills. Requirements presently specified could alter product performance and actually reduce life cycle. We also believe that credit should be given for using products where manufacturer agrees or certifies to take back and recycle product at the end of its service life. This would encourage manufacturers to establish methods and means to recapture and recycle original products.	MR Credit 1.2 Source Reduction and Waste Management-Storage & Collection of Recyclables The development of light weight, energy efficient, single-ply roofing materials allows for reroofing over an existing roof. There are numerous environmental and financial benefits such as: -Existing roof protects existing building and occupants during project. -Existing insulation is re-utilized eliminating waste and disposal and maximizing energy efficiency. -Reduces construction waste. -Reduces transportation of new insulation. We request that the last sentence of Potential Technologies/Strategies be revised to say: "Investigate salvaging/recycling lighting fixtures, and reroofing over existing roofing plans when reroofing". Materials and Resources: No longer any reference to material recycling. We believe that credit should be provided for using products that come from companies that can document a 100% material production yield (any scrap or waste generated during manufacturing process is recycled internally). This would reward plant quality and efficiency and reduce scrap to landfills. Requirements presently specified could alter product performance	LEED-EB is following the lead of LEED-NC on what material sustainability attributes to address. If in the future this is addressed in LEED-NC, it will be considered for inclusion in LEED-EB.	None	None
LEED-EB General Comments	Gen-Com19	LEED-EB General Comments --- EA Credit 5.4	agropfen (Andy Poppo)	US Dept. of Commerce, NOAA	I wish to comment on EA credit 5.4 (I don't see that the system will allow me to do so within the EA section). In general this credit is worded awkwardly and therefore is difficult to understand what a person must do (or bid), must achieve) to earn this credit. I think your objective under this credit is to have the bid, show that by employing certain energy saving techniques that this will/should reduce the pollutants that are listed. (Most of which are the EPA's criteria pollutants under the NAAQS.) Obviously, if a bid, is reducing its emissions of these pollutants that's a good thing.	Item #3 under the "Requirements" section starts by using the word "Retire". Is the 1st sentence intended to mean that a bid, must show that its emissions of one or all (or another number) of the pollutants listed must be reduced by 10%? Please specify and reward. Also, in the in the "Potential Technologies & Strategies" section, I don't understand what this is trying to say. Is it possible that some words have been left out? Is this section trying to say that using certain bid, energy efficient methods/devices that this reduces costs and those listed pollutants together? If so that may not be the case. Simple example: if a bid, was burning coal for its heat and later changes to burning natural gas, a safe assumption is that many of the listed pollutants will be reduced. However, the changeover may be more costly due to equipment and/or fuel costs. Lastly under the section "Substantially-Initial LEED-EB Certification, I do not understand what the 1st bullet is trying to say. It discusses calculating a savings - what kind of savings? Do you mean cost savings	I have no direct/suggested word changes. It depends on your true and underlying intent of those section that I don't understand. I can suggest however to have a person look at this credit carefully and check its "readability" and "understandability". Improve the wording as you see fit and be specific and clear such that the reader will not misinterpret what needs to be done/accomplished and later submitted.	This topic was not included as commentable in the second public comment period because the language was not significantly changed from the first public comment draft of LEED-EB. This credit encourages: (1) the reporting of the types of emission reductions which result from the energy efficiency, renewable energy and other emission reduction actions of the building owner; (2) The retirement of some of these emission reductions so they can never be bought or sold; (3) Asking ones suppliers to do these same three actions which helps to green the supply chain of the building owner. The calculations of emission reductions must address the types of fuel being burned. The LEED-EB Reference Guide clearly explains the actions needed to earn this credit.	None	None
LEED-EB General Comments	Gen-Com20	N/A (LEED-EB General Comments) --- EA Credit 2.1-2.4	ota (Otis Wollan)	Climate Neutral Network	Climate Neutral Network provides an option for certification that is not being recognized in this process. Recognizing a collaborative network of legitimate certifiers will expand the market, stimulating greater use of this credit.	Credits should be acknowledged and permitted from other certifying organizations, like Climate Neutral Network's "Climate Cool" certification, or Green e.	"Green power" may be procured from a Green-e certified power marketer, a Green-e accredited utility program, or through Green-e, Climate Neutral Network, or equivalent third-party certified Tradable Renewable Certificates."	See response to Comment EA2.1.2.4-Com1	See response to Comment EA2.1.2.4-Com1	See response to Comment EA2.1.2.4-Com1
LEED-EB General Comments	Gen-Com21	N/A (LEED-EB General Comments)	Idersche (Tom Detschke)	USGBC	Writing quality and readability are poor throughout.	Staff and professional copyediting. This is important for an understandable and professional presentation of any LEED product.	Too many examples to list here. Run-on sentences are a consistent problem.	Once the substance is pinned down based on the results of the second public comment period, the LEED-EB document will be thoroughly edited in preparation of the ballot draft. After the ballot version is approved by USGBC membership, the LEED-EB Document will be given a final editing and be formatted for publication.	Make changes in Proposed Response.	Editorial
LEED-EB General Comments	Gen-Com22	N/A (LEED-EB General Comments)	masonrysociety (Christie Subasic)	The Masonry Society	The LEED-EB rating system as written is geared primarily toward operations and maintenance of buildings (and might better be titled "LEED-Operations and Maintenance"). To better encompass existing buildings in their entirety, I believe at least 2 issues must be addressed that are currently not adequately covered under LEED-EB.	First, it is not clear from the public draft document that the LEED-EB rating of a building and its LEED-NC rating are not at all related. One might be silver, the other gold. This is an important distinction that is not clearly explained in the current draft. Also, for buildings first certified under LEED-NC, LEED-EB does not address the materials used for minor renovations (other than for construction waste). One example would be replacing carpeting. If the carpet selected when the LEED-NC certification was achieved met the Carpet & Rug Inst. Green Label IAQ, must the replacement carpet also meet this requirement to maintain the LEED-NC rating? A similar question could be posed for replacing a roof or any other minor renovation. Alternately, what if new points (according to LEED-NC) could be earned for replacing materials with those meeting LEED-NC credit requirements, such as recycled content, regional materials, etc. This is not covered under LEED-EB.	Add to the last paragraph on page 3 (cont. on page 4) of the 2nd public draft: The certification of a building under LEED-EB is distinct from its LEED-NC certification. It is possible for a building to be Silver LEED-NC certified and earn Gold LEED-EB certification. [NOTE that I do not have a suggestion for how the LEED-NC rating is maintained, especially if changes are made to the building.] Add to the Materials and Resources section credits paralleling those found in LEED-NC for regional materials, recycled content, etc.	The material issues are addressed in the MR section of LEED-EB.	None	None
LEED-EB General Comments	Gen-Com23	N/A (LEED-EB General Comments)	nickowski (Edward Ickowski)	EPF Commissioning Services, LLC	From my brief review of the EB draft, it appears there are many credits that an owner who does not take care of his building or property can earn. Whereas a responsible owner that has been implementing system and environmental upgrades over the life of his building will not be able to achieve the credit when based on improvement of performance. For example, owners A&B construct identical buildings in 1980. Owner A merely occupies his building and only invests in his facility when there is an equipment or system failure. Owner A chooses the cheapest first cost repairs. Owner B realizes the value of his building so he performs routine maintenance and in 1990 implements a three year modernization plan. Owner B installs high efficiency lighting and HVAC equipment, building automation system, enforces a recycling program, etc. Based on the EB credits that specify a reduction in energy or water consumption and reduced facility waste, owner B would not qualify or it would be extremely difficult to qualify since the major reduction had already occurred. Owner A could earn credits by reducing consumption and waste. The responsible bu	Performance should be compared to a baseline building. Since it is difficult to generate accurate models, a building owner that has already implemented green technology should receive the appropriate credit. This would encourage both the owner that is reluctant to care for his building to do so and the responsible owner would earn points for past and future diligence. A responsible owner that loses 10 or 15 points because the green technology has already been implemented may not chose to implement further additional technology to become certified. It is possible that a well maintained building could score less points and function more efficiently than a poorly maintained building that implements green technology and becomes certified. The uncertified, more efficiently operated building owner will become an opponent to LEED-EB rather than a proponent.	The previously installed green technology must be described (installation date, system description including catalog cut sheets and model/year) submitted for review along with the previous 12 months utility bills. If the bills can not be submitted, a utility consumption comparison must be prepared indicating the savings of the green technology.	LEED-EB does evaluate performance using fixed performance baselines rather than evaluating performance relative to past performance. Fixed baselines are used to avoid the problems of relative baselines which would not compare buildings to the same standards.	None	None

LEED-EB General Comments	Gen-Com24	N/A (LEED-EB General Comments)	UC Office of the President	UC Office of the President	UC would like to be able to participate widely in this program, and feels that it can be a useful tool for promoting and maintaining sustainable facilities operations. However, if the program is to be deployed widely, the amount of reporting that campuses are required to submit must be able to be reasonably accomplished by existing staff since UC does not have the ability to add additional staff or hire consultants for this documentation. We therefore ask you to consider requiring that credit documentation be submitted on a yearly rather quarterly basis as currently proposed. In addition, many of the policies covered by LEED EB prerequisites and credits are implemented on a campuswide basis rather than building by building – we request that these policies be reviewed and approved once and that the prerequisite or credit is approved by campus rather than by building			(1) Quarterly reporting. See response to comment SS4.2-Com1. (2) Campus wide application of actions to earn prerequisites and points. LEED-EB accepts and encourages campus wide application of actions that earn prerequisites and credits wherever this is feasible. The campus wide documentation can then be provided and then simply be referenced in the applications for each building on the campus.	None	None
Comments to Non Substantive changed Credits Received Directly (Not submitted through the USGBC website)										
LEED-EB General Comments	Gen-Com25	SS Prereq 1	UC Office of the President	UC Office of the President	Prerequisite 1 – Erosion and Sedimentation Control. This prerequisite seems to be more appropriate to construction than to building operations. UC campuses typically have an erosion control policy by campus rather than by individual building			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – (1) Construction: There are many small construction projects over the life of a building and LEED-EB is designed to encourage sustainable approaches to all construction projects over the life of a building. (2) Campus wide implementation: See response to Comment Gen-Com24.	None	None
LEED-EB General Comments	Gen-Com26	SS Credits 1.1-1.2	UC Office of the President	UC Office of the President	SS Credits 1.1-1.2. The majority of the practices covered by this point are again covered by campuswide policies. This credit seems important and that it should be worth a higher point value.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – (1) Construction: There are many small construction projects over the life of a building and LEED-EB is designed to encourage sustainable approaches to all construction projects over the life of a building. (2) Campus wide implementation: See response to Comment Gen-Com24. (2) Points allocations: In the future, based on experience gained overtime, the points allocations will be reviewed for LEED-EB and other LEED rating systems.	None	None
LEED-EB General Comments	Gen-Com27	SS Credit 2	UC Office of the President	UC Office of the President	SS Credit 2 – This point is appropriate for new construction, but it does not promote more sustainable practice in facilities management. Recommend eliminating this point for LEED EB and placing higher value on credit 1			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – See response to Comments Gen-Com 25 and Gen-Com26.	None	None
LEED-EB General Comments	Gen-Com28	SS Credit 4.1	UC Office of the President	UC Office of the President	SS Credit 4.1 – Request that a campus could submit copies of published transit schedules and routes rather a record of quarterly contacts with transit authorities.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – Quarterly reporting; See response to comment SS4.2-Com1.	None	None
LEED-EB General Comments	Gen-Com29	SS Credit 7.1	UC Office of the President	UC Office of the President	SS Credit 7.1 – Request that high-rise parking be considered as an alternative to placing a minimum of 50% of parking underground. Again this is a campus wide rather than building specific issue.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – (1) For a high rise parking structure all but the exposed top floor are considered the equivalent of underground parking. (2) The parking can be allocated to campus buildings or parking related actions can be implemented campus wide and each building on campus can then reference this campus wide implementation in its LEED-EB application.	None	None
LEED-EB General Comments	Gen-Com30	WE Prerequisite 1	UC Office of the President	UC Office of the President	WE Prerequisite 1 – Request that a more easily calculated baseline methodology be developed – perhaps using the metrics of gallons per square foot or gallons per occupant.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – In the future once more experience is gained in the measured water use in different buildings in various geographic locations, it may be possible to move to a gallons per square foot or per occupant. The baseline approach included in LEED-EB is the best approach for now.	None	None
LEED-EB General Comments	Gen-Com31	EA Credit 3.3	UC Office of the President	UC Office of the President	EA Credit 3.3 – Request that submital requirement for "performance over the performance period" be changed to documentation of alarms that occurred and corrective action rather than % of time desired conditions are delivered.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – The alarms and response time for correction can be used to calculate the percent of the time the desired conditions are delivered. The alarms and rapid correction are means to the end of delivering the desired conditions for a high percentage of the time.	None	None
LEED-EB General Comments	Gen-Com32	EA Credit 5.1-5.3	UC Office of the President	UC Office of the President	EA Credit 5.1-5.3 – Request inclusion of chilled water, hot water or steam metering to include buildings served by a central heating and/or cooling plant. Request inclusion of whole building electric interval data meter to include campus buildings not directly served by an outside utility.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. – Building level sub metering is required for campus buildings that are not served by separate utility meters.	None	None

LEED-EB General Comments	Gen-Com34	EA Credit 4 (Additional Ozone Protection)	ACEEE	ACEEE	ACEEE Comments: Additional Ozone Protection (ODP) addresses only one aspect of the broader problem of atmospheric impacts. It ignores the larger issue of greenhouse warming potential (GWP). Although the two are not perfectly commensurate, many HCFC compounds have very short atmospheric residence times. When they allow greater efficiency, the combined effect (TEWI) is to reduce atmospheric climate impacts relative to HFCs. Of course, contained refrigerants have no impact on climate, and one manufacturer offers products with guaranteed 1% annual leakage rates. There is significant danger that the present LEED-EB strategy, particularly as it deals with refrigerant replacement, could lead to greater climate impact through encouraging less efficient solutions. There is an extensive peer-reviewed literature in this area, such as Wuebbles and Cain, 1997 (Science 278, p. 1090-1091), and Cain and O'Don, 1997, Refrigerants for the 21st Century. Proceedings of the ASHRAE/ENRIST Refrigerants Conference, Gaithersburg, MD, pp 6 - 19.			This, we respectfully suggest that USGBC send a consistent message that ODP is part of the climate change puzzle for which multiple approaches are warranted. We suggest wording such as: EA Credit 4 Atmospheric Protection, 1 Point. Intent Reduce climate change potential through best practices for refrigerants and equipment efficiency (direct and indirect climate effects). Requirements (leaving out fire protection) New equipment, regardless of refrigerant, must conform to tables in e-Benchmark, "Energy Benchmark for High Performance Buildings," Section E, Mechanical Equipment Efficiency Requirements (New Buildings Institute, 2003, www.newbuildings.org). For buildings using HCFC equipment, Reduce emissions of refrigerants from base cooling equipment to less than 2% of charge per year over the performance period using EPA Clean Air Act, Title VI, Rule 608, procedures governing refrigerant management and reporting and reduce the leakage over the remainder of unit life to below 25%.	Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - This issue is being addressed by the TSAC and whatever outcome is arrived at through the TSAC process will be incorporated into LEED-EB.	None	None
LEED-EB General Comments	Gen-Com35	EA Credit 4 (Additional Ozone Protection)	Mandyck, John	Carrier	(1) Regarding E4A (p.60), LEED should not recognize HCFC-123 under the ozone protection credit. HCFC-123 is an ozone depleting substance that will be banned in the U.S. under the Clean Air Act. All nations are eliminating the use of ozone depleting substances, including HCFC-123, under the Montreal Protocol. The European Union has already banned HCFC-123 in new equipment. Ozone depletion remains a critical issue for our planet, which experienced record ozone loss in the past 12 months. Additionally, new reports (AIA Journal, January 2003) suggest the toxicity of HCFC-123 may be currently understated.	(2) E4A should be limited to non-ozone depleting refrigerants only.	(3) Eliminate draft text on page 60 that states: "provide documentation that all existing base cooling equipment for the building that used CFC-11 have had this refrigerant replaced with HCFC-123."	Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - This issue is being addressed by the TSAC and whatever outcome is arrived at through the TSAC process will be incorporated into LEED-EB. The language included on HCFC-123 was proposed by TSAC.	None	None	
LEED-EB General Comments	Gen-Com36	MR - General	UC Office of the President	UC Office of the President	MR - general - Request that you consider adding a credit for a recycling program for electronic waste.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - Electronic waste recycling should be included in the overall waste stream numbers and in the occupant recycling program. In the future additional points will be given for waste stream reduction.	None	None	
LEED-EB General Comments	Gen-Com37	EQ Credit 2 (Increased Ventilation)	ACEEE	ACEEE	ACEEE has no comments on the naturally ventilated buildings component. However, we do have concerns about the likely impact of increased overall ventilation. We respectfully suggest that this credit contradicts the intent of IEQ Credit 9 Contemporary IAQ Practice in many buildings and in many regions. In particular, excess humidity is itself an air pollutant; bringing in more outside air must increase the risk of excess humidity in many climates, and must increase the costs of ventilation air dehumidification to control this threat. As a corollary, dehumidification is generally done by cooling air to condense the moisture, leading to higher maintenance for larger coils, drains, and associated equipment. Please note that maximum humidity challenges occur at moderate outdoor temperatures values when there is high humidity (e.g., upper 70s and raining); this is not just a "Florida or Texas" problem, but widespread in shoulder seasons. Increasing ventilation rates beyond 02.1 will increase the cost of dehumidifying make-up air, and increase the likelihood of mold problems.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - The energy credits and the points for maintaining conditions provide significant incentives to do this in an energy efficient way that maintains desired indoor environmental conditions. This is a credit rather than a prerequisite so implementations are optional for buildings in LEED-EB. In the future, once more experience is gained with this credit, changes will be considered.	None	None	
LEED-EB General Comments	Gen-Com38	IEQ Credit 2 (Increased Ventilation)	UC Office of the President	UC Office of the President	IEQ Credit 2 - please note that increasing ventilation rates to 30% above minimum standards may be in conflict with energy performance credits for the building. How was the 30% increase determined? Are there studies that document the tradeoffs between increasing ventilation above requirements and energy performance of the building?			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - See Response to Comment Gen-Com37.	None	None	
LEED-EB General Comments	Gen-Com39	IEQ Credit 8.1-8.4 (Daylighting and Views)	UC Office of the President	UC Office of the President	IEQ Credits 8.1,8.2,8.3,8.4 are appropriate to new construction, but do not appear to act to promote sustainable facilities operations.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - EA Credits 8.1-8.4 encourage both gradual increases in the amount of daylighting and increases in the amount of floor space with views to the outside over the life of the building.	None	None	
LEED-EB General Comments	Gen-Com40	SS Credit 1 (Green Site Plan)	SWA	SWA	Under Re-certification Submittals, consider eliminating need to resubmit Narrative Overview if Plan hasn't changed since last LEED EB Certification			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - Where documentation has not changed it can simply be referenced in the resubmittal applications.	None	None	
LEED-EB General Comments	Gen-Com41	SS Credit 7.2 (Heat Island Roof)	SWA	SWA	Potential Technologies & Strategies: EnergyStar lists highly reflective roofing materials only, include source high emissivity roofing as well (listed in LEED-NC Reference Guide, Submittals). Confirm that installed roofing can be measured according to ASTM E408, if that is the intention of this credit. To our knowledge, there is only one lab in the US with the equipment to measure emissivity per E408. The lab performs the test 3" square samples of the roofing material received at the lab. Also, check submittal paragraph referring to 70% coverage, not 75%.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - The area of application in the submittals will be changed to 75% to match the requirements.	Make changes in Proposed Response.	Clarification	
LEED-EB General Comments	Gen-Com42	WE Prerequisite 2 (Discharge Water Compliance)	SWA	SWA	We do not feel the comments submitted to the LEED EB committee on this credit were properly addressed. This credit has not been updated.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - The first comment period comments were considered and it was decided to make no change.	None	None	
LEED-EB General Comments	Gen-Com43	WE Credit 1.1 (Irrigation - 50%)	SWA	SWA	Setting a sliding scale for the project's "base case" that depends on local/regional practices sets a new precedent for LEED. We are not confident this will be considered fair. Under Submittals: Quarterly water meter readings will not reflect annual average water use, so quarterly reviews should only be required to verify there have been no changes to the irrigation system.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - Currently evaluating irrigation water use relative to local practices in the best that can be done. In the future, once more information is gathered through experience with this credit, perhaps specific regional standards for water use for irrigation can be established.	None	None	
LEED-EB General Comments	Gen-Com44	WE Credit 2 (Innovative Wastewater)	SWA	SWA	WE2Com5 requests an alternative compliance path for this credit involving low or no-water using toilet and urinal fixtures. LEED EB's response rejects this request, but, in fact, the strategy is currently allowed under LEED NC. Though it's not necessary to change the credit criteria, low and no water using toilet and urinal fixtures should be list under Potential Technologies Submittals - LEED EB Re-Certification. Include both the 50% reduction and 100% waste treatment option in situations where the system has been changed and has not changed.			Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - Low and no water use urinals and toilets will be included in the Technologies and Strategies section.	Make changes in Proposed Response.	Clarification	

LEED-EB General Comments	Gen-Com45	EA Credit 1 (Optimize Energy)	SWA	SWA	Submittals require submission of last 12 months of energy bills-why would this be requested again, if it's required by EAp2.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. Submittals for prerequisites can be referenced for these credits. Submittal language will be changed to reflect this.	Make changes in Proposed Response.	Clarification
LEED-EB General Comments	Gen-Com46	EA Credit 3.2 (Systems Maintenance)	SWA	SWA	Define "Best Practices Equipment Maintenance Program". Is there a standard that can be referenced?		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. This will be considered in the future as more experience is gained. So far this does not seem to be a significant barrier to earning this point.	None	None
LEED-EB General Comments	Gen-Com47	EA Credit 5.4 (Emission Reduction)	SWA	SWA	Consider making criterion #4 –asking suppliers to comply with items 1.2 &3 –a separate credit because asking every supplier of goods and services (e.g. the soda vendor, toilet paper supplier, window washer, snow remover, grass mower, etc.) to track and reduce energy emissions is a considerable undertaking that should not dissuade buildings from pursuing items 1.2 &3.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. This will be pointed out in the LEED-EB Reference Guide.	None	None
LEED-EB General Comments	Gen-Com48	EA Credit 6 (Documenting Sustainable Building Costs)	SWA	SWA	Provide list of operating costs that need to be analyzed at a minimum (e.g. fuel, electricity, cleaning, insurance, pest control, repair, healthcare, etc).		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. This will be provided in the LEED-EB Reference Guide.	None	None
LEED-EB General Comments	Gen-Com49	MR Credit 5.1-5.3 (Occupant Recycling)	SWA	SWA	Mention that the total waste stream was calculated in MRP1.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. This will be pointed out in the LEED-EB Reference Guide.	None	None
LEED-EB General Comments	Gen-Com50	EQ Prereq 4 (PCB Removal)	SWA	SWA	Potential Technologies & Strategies: "remove" should be "removed".		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. This spelling correction will be made.	Make changes in Proposed Response.	Editorial
LEED-EB General Comments	Gen-Com51	EQ Credit 2 (Increased Ventilation)	SWA	SWA	We reiterate comments expressed in the first review period that ASHRAE 62-2001 is an appropriate and well-crafted standard and exceeding ASHRAE 62-2001 increases the building's energy use considerably without meaningful or known benefits to occupants. Consider a performance-based standard for improving indoor air quality instead.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. See response to Comment Gen-Com37.	None	None
LEED-EB General Comments	Gen-Com52	EQ Credit 4.2 (Documenting Productivity: Other Productivity Impacts)	SWA	SWA	Submittals: Notice floating "I".		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. This will be corrected.	Make changes in Proposed Response.	Clarification
LEED-EB General Comments	Gen-Com53	EQ Credit 5.2 (Isolation of High Volume Copying/Print Rooms/Fax Stations)	SWA	SWA	Clarify "This credit can also be earned by putting all copiers exceeding a lower capacity or usage threshold in isolated separately ventilated rooms." It's not clear why this statement is in the credit Requirements and what it means. Submittals – Initial LEED-EB Certification: Fix grammar of 1st bulleted sentence. Submittals – LEED-EB Re-Certification: Fix grammar of 2nd bulleted sentence.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. The suggested editorial changes will be made. The language on allowing building owners to provide isolated and ventilated space for lower volume copiers will be retained because it lets building owners tighten the standard for this credit.	Make changes in Proposed Response.	Clarification
LEED-EB General Comments	Gen-Com54	EQ Credit 10.3 (Green Cleaning - Low Environmental Impact Cleaning Policy)	SWA	SWA	Clarify whether green cleaning products used must also comply with MR Credit 4.1-4.3?		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. This will be clarified to state that the policy must specify the use of cleaning products that meet the requirements identified in MR credit 4.1-4.3.	Make changes in Proposed Response.	Clarification
LEED-EB General Comments	Gen-Com55	EQ Credit 10.4 – 10.5 (Green Cleaning - Low Environmental Impact Pest Management Policy)	SWA	SWA	Submittals – Initial LEED-EB Certification: 4th bullet of 1st tier of bullets: The "least toxic" pesticide can still be very toxic, so notification should be required whenever pesticides are used.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. The LEED-EB Reference Guide will include notification of use in the list of issues that a TMP needs to address.	None	None
LEED-EB General Comments	Gen-Com56	EA Prereq 2 (Minimum Required Energy)	USEPA	USEPA	In Rating System and Reference Guide, change the title on EA Prerequisite 2 to accurately reflect the requirement. LEED-EB is not suggesting to "minimize energy performance" but rather improve performance beyond the standard.	Change the title on EA Prerequisite 2 to accurately reflect the requirement. LEED-EB is not suggesting to "minimize energy performance" but rather improve performance beyond the standard.	Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. Name will be changed to "Minimum	Make changes in Proposed Response.	Editorial
LEED-EB General Comments	Gen-Com57	EA Prereq 2 (Minimum Required Energy)	USEPA	USEPA	We acknowledge the LEED-EB prerequisite 60 rating on the EPA – Energy Performance Rating scale. However we submit that the prerequisite energy performance rating should support the premise that "LEED-EB was designed to reflect the best practices of the top 25% of [new] buildings". By raising the standard to a 75 rating will ensure that buildings achieve the minimum standard of energy performance for LEED-EB certification. Furthermore, a "White Paper on Sustainability" published by Building Design and Construction dated November 2003, documents "Total points earned out of total possible points" that energy scored the lowest percentage – 30.8%. The study confirms that users have not aggressively gone after energy points. By increasing the prerequisite all LEED-EB certified buildings would be rated in the top 25% for energy performance.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. LEED-EB unlike LEED-NC is a process or a journey and LEED-EB covers a broad range (and strives to cover the full range) of building impacts on the environment. As a result, LEED-EB will have the biggest impact on reducing overall environmental impacts of buildings (including those caused by energy use) by getting buildings engaged and encouraging them to move up the scale of sustainability (including energy use reductions) over time through the ongoing recertification process.	None	None
LEED-EB General Comments	Gen-Com58	EA Credit 1 (Optimize Energy Performance)	USEPA	USEPA	EPA recommends a slight modification to the LEED-EB energy points that correspond to the EPA Energy Performance Rating. This change was prompted from concerns raised by Jeff Harris at LBNL. On the EPA energy rating scale—the incremental percent of energy savings increases disproportionately at the higher end of the scale, thus a five point increase on the numeric (1-100) scale doesn't necessarily represent the same percent energy savings. Therefore, we recommend USGBC assign one LEED-EB energy point for each 5% energy savings increment.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. For LEED-EB the goal is to drive buildings up the energy efficiency achievement scale. Keeping this message clear and simple is more important than having each point represent the same increment of energy efficiency improvement.	None	None

LEED-EB General Comments	Gen-Com59	EA Prereq 2 Minimum Required Energy and EAc1 - Optimize Energy Performance)	USEPA	USEPA	Correct any applications of and descriptions that incorrectly characterize the EPA rating and/or ENERGY STAR in both the LEED-EB rating and reference guide. For example, remove detailed descriptions of EPA rating requirements that are out-of-date and suggest referring users to the EPA website, which is updated on a regular basis.		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - The descriptions and information about EnergyStar in the LEED-EB rating system and in the LEED-EB Reference Guide will be made accurate based on the EPA comments provided.	Make changes in Proposed Response.	Editorial
LEED-EB General Comments	Gen-Com60	EA Prereq 2 Minimum Required Energy and EAc1 - Optimize Energy Performance)	USEPA	USEPA	We found that there were too many methods to qualify for LEED-EB certification. We recommend that the "Abbreviated Method for Calculating Energy Performance" be deleted all together. The Abbreviated Method doesn't give an accurate and complete measure of sustained energy performance nor does it account for a full year of weather data - thus should not be used as a method for obtaining certification. Allowing building owners to extrapolate future energy use as the basis for certification minimizes the credibility of the LEED-EB rating. Not to mention, that it could be confusing for users to know which "method" they should use for certification. The Alternative Method being developed by the LEED-EB committee was not included in this LEED-EB document for us to review and make comments. However, we recommend that the Alternative Method and EPA-Energy Performance Rating be addressed in a separate statement and characterized as its own method for measuring performance. In Rating System and Reference Guide 1) Add an explanation that this section has two paths for certification. 2) For Alternat		Because this is the second public comment period for LEED-EB, the only topics included in the commentable items for the second comment draft of LEED-EB were the items that had been significantly changed from LEED-EB Comment Draft 1. All topics were open to comment in the first public comment period for LEED-EB which occurred in March 2004. - See response to Comment Gen-Com57. Participants in LEED-EB can only use the abbreviated method once (or the first time certification). For each recertification, they will need to use a full year and demonstrate the performance over the whole performance period which is at least 1 year and can be as much as 5 years.	None	None
LEED-EB General Comments	Gen Comment 61	EQ Prereq 3 & EQ Prereq 4			Both of these credits duplicate enforcement of existing legal and regulatory enforcement of regulations on asbestos and PCBs respectively. It would be far clearer to require that building owners document that they have programs in place to meet applicable regulatory requirements and that they have current survey identifying where asbestos and PCBs are located in their buildings.		Change requirements for these two sections to read as follows: IEQp3 "Have in place an asbestos management program. Identify the applicable regulatory requirements. Have a current survey that identifies where asbestos is located in the building and on the site so that the asbestos present can be addressed appropriately in the ongoing asbestos management program. " and IEQp4 "Have in place a PCB management program. Identify the applicable regulatory requirements. Have a current survey that identifies where PCBs are located in the building and on the site so that the PCBs present can be addressed appropriately in the ongoing PCBs management program. " Make changes in the technologies and strategies section and the submittals section to reflect these changes to the requirements.	Make changes in Proposed Response.	Clarification