October 28, 2024

U.S. Green Building Council (USGBC)

***to be *submitted online via USGBC credit library*

RE: ACA Comments on USGBC on the Latest Green Building Rating System (LEED v5 Second Round of Comments)

To Whom It May Concern,

The American Coatings Association (ACA) submits the following comments to USGBC for consideration to the Leadership in Energy and Environmental Design (LEED) v5. ACA is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory, and judicial issues, and provides forums for the advancement and promotion of industry. The ACA represents approximately 96% of the paint and coatings products manufactured in the United States, including architectural, industrial, and specialty coatings.

The $32 billion paint and coatings industry manufactures a wide variety of coatings products for consumers, businesses, and manufacturing establishments alike and plays a critical role in helping to preserve and protect our infrastructure. Coatings are used extensively throughout this nation's infrastructure, such as on buildings, across the expansive pipeline infrastructure, on steel structures like bridges and railroads, and on roads as traffic markings.

The comments below were submitted individually to USGBC LEED through the online LEED credit library under each of the rating system(s) indicated within parentheses and the identified credit category. This letter serves to consolidate these comments.

1. **Providing alternative options for LEED credits in the Additional Resources for Materials & Resources (MR) Credit: Building Product Disclosure and Optimization (New Construction; Core and Shell; Commercial Interior)**

ACA recognizes that USGBC put forth additional resources for the MR Credit: Building Product Disclosure and Optimization that introduces a new framework for a multi-attribute approach and that this aligns with the American Institute of Architects (AIA) approach in the materials pledge and the mindful Materials Common Materials Framework. This framework

allows product attributes that would have been recognized in LEED v4 and continued to be recognized in LEED v4.1 to have a pathway for recognition in LEED v5. The paints and coatings industry is a global industry requiring flexibility to meet various requirements around the world. While the LEED rating system is world-recognized, there are still other reporting mechanisms, such as the Materials Ingredient Report, that exist which our industry relies upon. ACA recognizes that the framework within the additional resources for the MR Credit: Building Product Disclosure and Optimization combines several credits, and ACA recommends that USGBC continue to allow for flexibility in the credit pathway.

2. **Allowing public comments for any future changes in the Additional Resources for Materials & Resources (MR) Credit: Building Product Disclosure and Optimization (New Construction; Core and Shell; Commercial Interior)**

The additional resources for MR Credit: Building Product Disclosure and Optimization provides guidance through a new framework on how products can be evaluated for impacts to human health, climate health, social equity, and promoting a circular economy. However, ACA is concerned regarding the lack of transparency should any changes to this document occur in the future since it is not part of the balloted LEED v5 rating system. ACA seeks clarification on how changes to this guidance document would be communicated and whether any public comment period would occur for any future changes. Furthermore, ACA recommends that USGBC includes the additional resources for MR Credit: Building Product Disclosure and Optimization to be part of the LEED v5 balloting process to provide the public with an opportunity to comment on this new framework.

3. **To provide a numerical example and walkthrough for how to correctly calculate the multi-attribute adjusted value of a product category for Materials & Resources (MR) Credit: Building Product Disclosure and Optimization (New Construction; Core and Shell; Commercial Interior)**

Under this credit category, there are two options that are intended to give credit for using products and materials that provide information on its environmental impacts. The second option for Product Categories provides points on selecting eligible materials and products. Furthermore, an equation (Equation 1) explains the calculation for the multi-attribute adjusted value of a product category. While this equation tries to set forth how to make made these calculations, the text within the equation makes it abstract and vague with respect to how the equation would practically be used. It may be more useful to provide an example with numerical values.

In addition to providing a numerical example, one possible suggestion would be to provide a walk-through video or similar resource explaining how to submit this type of information. This potential guide would be very useful to contractors, architects, and other building project managers and increases the likelihood that their document submissions would be accepted on the first submittal. In turn, this type of guidance would streamline the credit document process and promote efficiency across the LEED system.

Therefore, ACA requests that USGBC also provide a numerical example, walk-through video, or other similar resource to provide clarification on how Equation 1 can be used.

Conclusion

In conclusion, ACA appreciates the opportunity to provide comments on this. This letter serves to consolidate these comments which were submitted online through USGBC's credit library under the indicated rating systems and credit categories.

Sincerely,

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