



September 5, 2008

GS-33 Response to Comments on Provisional Revision

Green Seal proposed a provisional revision to the Environmental Standard for Lodging Properties, GS-33 on June 6, 2008. Comments from the public were solicited on the creation of levels of certification included in the proposed provisional revision until August 15, 2008.

Included in this document are the comments received on the Proposed Provisional Revision for Lodging Properties, June 6, 2008 with responses and explanation on how the standard was modified accordingly.

By participating in Green Seal's standard setting process, the following organizations that provided comments played an important role in Green Seal's effort to encourage the design, manufacture and end use of environmentally superior products. Their assistance and involvement is greatly appreciated.

Hyatt Regency Washington
Portland Marriott Downtown Hotel

Tiering structure

Entry tier (limited criteria, time limit); Leadership tier (full Green Seal standard); Top tier (full Green Seal standard plus elite performance in some criteria).

COMMENT:

I like the idea of tiering the structure of Green Seal 33. It would give hotels credit for meeting some of the criteria of GS-33. The all or nothing structure was difficult to achieve and if a property didn't have enough resources or physical property limitations, then they would not be able to get certified.

RESPONSE:

Comment acknowledged.

Entry tier requirements

We invite your comments on the selected criteria to meet the entry level certification, noting that there is a time limit for staying in this level.

COMMENT:

The proposed changes for Level 3 certification seem very tough around some of the energy items. Some thought should be given to the fact that many hotel operators are not owners of their buildings. So the obligation to Owners or ability to influence some of their investments may severely limit the number of properties that can achieve this.

RESPONSE:

Level 3 was created to reflect very high levels of achievement. This level is intended to only be achievable by a small niche of properties and indicate the direction sustainable practices heading. However, it is not intended to exclude achievement based on ownership type. So, various options to meet the requirements is included in the standard: meet 3 of the possible 7 options. Further, it is anticipated that additional options to achieve this level of certification will be available in the future.

Top tier requirements

We would like your comments on the criteria outlined to meet the top tier for certification, which is intended to recognize elite performance.

COMMENT:

Top Tier performance seems very difficult. It does have some overlapping with LEEDS. Although LEEDS does have the flexibility of meeting some of the requirements & still be performing at a top tier. There doesn't seem to be much incentive for a property to strive for top tier level if you have issues around one or more of the requirements. Unlike LEEDS, which recognizes a span of achievement, not an all or nothing. I feel all elite performances should be recognized.

RESPONSE:

There are various options provided in the standard to meet the requirements of this top level of achievement, a property must meet 3 of the possible 7 options. So, it ends up being more flexible than an all or nothing approach. However, this level of achievement is expected to be possible for only a few properties at this time, and this is the intention. The options reflect the direction the industry is expected to take in the future and as a result more properties will be able to meet the requirements. Further, as progress in sustainable practices continues, these requirements will evolve and additional options will be available.

Names of tiers

We invite your input on the names of the tiers - ex. 1, 2, 3 or *, ***, **** (stars).....

COMMENT:

You could use the same as LEEDs, so that there was some continuity in Environmental certifications.

COMMENT:

I think the number of "Seals" earned should represent the level of Green Seal Certification (similar to an environmental program in FLA where they earn palm trees for each level attained).

RESPONSE:

The approach taken with the names of the levels of achievement was to find a recognizable convention that provides clear distinctions and is easily understood. Since there are three levels achievable in this standard it seemed that numbers of items (like seals or trees, etc.) may not correspond to common conventions which have four or five. As a result, the medal awards will be used: bronze for the first level, silver for the second level, and gold for the third level.