

**USGBC TSAC PVC Draft Report dated December 17, 2004 (released 12/22/04)
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Submit to tsac@committees.usgbc.org, any time before midnight on February 15, 2005.

Comments submitted by:

First Name	Last Name	Title	Organization	Phone	E-mail	Web site URL
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Comments:

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General		<p>Since the draft of the report was made public, we have begun to experience manufacturers of PVC products such as windows and vinyl wallcovering citing the report as their rationale of why their products not only do not harm the environment, but are their "green" products. In my most recent discussion, a window manufacturer's representative told us that their PVC windows were more environmentally friendly than their fiberglass windows. They cited press releases from the vinyl industry that touted the position stated in the USGBC TSAC draft report.</p> <p>As a LEED tm Accredited Professional and Principal of a 58-person Architecture and Interior Design firm specializing in design of Healthcare and Senior Living facilities, I am appalled that the USGBC could find itself in the position of destroying the momentum that has been established which is changing the marketplace to demand products that do not involve the production of toxic chemicals. Only two years ago, when we asked manufacturers about alternatives to PVC for wall protection specialties, their representatives seemed to think we had lost our minds. Today, these same manufacturers</p>	

		<p>are quick to tout their non-PVC products.</p> <p>The changes within the industries that use PVC are coming quickly. The manufacturers that understand why change is necessary and good will be successful. Those that don't understand will slowly lose business to those who do. The entire premise of the USGBC, that the building industry can cause change to occur more quickly when everyone is working together, is being risked by the fallout of this draft report.</p> <p>I urge the committee to reconsider its findings and, after further research, reissue a new draft that corresponds to the direction that forward-looking members of the building industry have been following in recent years.</p> <p>I agree with the position of the Healthy Building Network, which makes the following recommendations:</p> <p>Three things must be done to improve the report:</p> <ol style="list-style-type: none">1. Public Policies That Target Particularly Harmful Toxic Chemicals and Their Serious Environmental Health Impacts Must Be Respected. <p>The record contains analysis and conclusions by many health authorities that PVC production, use and disposal pose unique health risks to workers at vinyl chloride monomer and PVC production facilities, to residents near those facilities, to first-responders at fires involving PVC, to consumers living and working in buildings with PVC components, and globally, to people whose food supply is contaminated by long lived, highly toxic byproducts of the PVC lifecycle. The draft report fails to incorporate these findings. As a result, the draft report contradicts policies put in place by authorities such as the United Nations Environment Programme, and the State of New York.</p> <ol style="list-style-type: none">2. Rating Systems Which Integrate These Public Policies Represent The Best Practice In Building Design. They Must Be Respected. <p>The record contains several examples of materials evaluation systems by industry leaders such as McDonough/Braungart, Skanska, Kaiser Permanente and the Green Guidelines For Health Care. Each of these successfully integrates public policy mechanisms, such as elimination of priority toxic chemicals like dioxin goals, into the materials analysis. The draft report fails to discuss or incorporate these models. As a result, the draft report contradicts the best practices in materials</p>	
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		<p>evaluation by green building leaders today.</p> <p>3. Manufacturers That Have Incorporated These Best Practices Into Product Design Should Be Rewarded, Not Penalized, By LEED.</p> <p>An ever increasing number of product manufacturers reject PVC based upon their own materials evaluation systems. Some examples include Firestone Building Products (membrane roofing) and Herman Miller, Inc. from the building industry, as well as global brands such as Nike and IKEA. The draft report fails to discuss or incorporate these models. As a result, the draft report threatens this positive market trend.</p>	