

September 5, 2008

Dear USGBC:

We, the undersigned environmental groups, appreciate the opportunity to comment on the recently released draft of the USGBC Forest Certification Benchmark. Those of us who are USGBC members intend to submit specific comments to individual benchmarks using the on-line system that USGBC has established. But the on-line system affords only limited opportunity for general commentary, not only on the contents of the benchmark but also on the process that is unfolding. Such is the purpose of this letter.

First, we want to make clear that we support the stated intent of the USGBC benchmark: to establish clear metrics by which one can identify forest certification systems that represent exemplary forest management in terms of social as well as environmental responsibility. It is vital, however, that 1) the benchmarks are sufficiently detailed and stringent such that only forest certification systems whose standards and procedures recognize truly exemplary forestry are rewarded by LEED, and 2) the process by which the benchmarks will be finalized and later applied to forest certification systems is clear and balanced.

Benchmark Process

Only forest certification systems that recognize truly exemplary forestry should be rewarded by LEED. If USGBC were to establish weak benchmarks that legitimize environmentally destructive and socially harmful *status quo* forest practices, the damage to its credibility and leadership standing in the marketplace would be serious and lasting. This will also occur if USGBC develops stringent benchmarks but falls short in its process for assessing forest certification systems against them. In this complex undertaking, process is as important as substance.

It bodes well that, to date, USGBC has shown wisdom and integrity in its management of the process for revising the Certified Wood LEED credit, which so far has been remarkably transparent, open and balanced. We are surprised and concerned, therefore, that important aspects of the process going forward seem to lack these characteristics.

For example, we understand that only representatives of the major forest certification systems operating in North America – FSC, SFI, CSA, and ATF – will have the opportunity to meet directly with USGBC staff during this critical period when the USGBC Forest Certification Benchmark will be finalized. It must be pointed out that this approach effectively ‘stacks the deck’ in favor of the less rigorous, industry-driven forest certification systems.

Surely by now USGBC understands that underlying the forest certification controversy are two major and opposed ‘camps’: FSC and its supporters among social and environmental groups and progressive industry (including many in the green building movement) form one camp; and SFI, CSA and ATF, their supporters in the mainstream forest products industry, and their allies in the mainstream building industry form the

other. Note that SFI, CSA and ATF now mutually recognize one another through PEFC – the Program for the Endorsement of Forest Certification that has its roots in the European forest products industry and now provides an umbrella for industry-driven forest certification systems all over the world.

If USGBC wishes to maintain balance in the process of revising the Certified Wood Credit, it is important that it achieve equal representation from the two major ‘camps.’ If SFI, CSA, and ATF will all have seats at the table with USGBC, then FSC and its supporters should have an equal number of seats. Also, the credit revision process would benefit from the direct input of representatives of key environmental groups, social interests, and/or green building advocates.

Another major concern is that USGBC apparently hasn’t yet formulated the process by which forest certification systems will be assessed against its benchmark in the future. Given the amount of time and professional expertise that USGBC has brought to bear on this issue, we are surprised and troubled that this fundamental aspect of the credit revision is not being presented at the same time as the benchmark itself. Further, we understand that USGBC will seek an up or down vote of the Forest Certification Benchmark by the USGBC membership before it develops and reveals the assessment process.

We believe it is critical that USGBC formulate its proposed assessment process and subject it to public comment prior to finalizing the benchmarks. Written in brief and, in some cases, quite vague terms, the benchmarks are open to a wide range of possible interpretations, and hence could lead to a wide range of potential environmental outcomes. How the assessment is to be performed and by whom are therefore as critical as the benchmarks themselves. USGBC members will not be able to adequately predict the environmental and social outcomes that may result from the application of these benchmarks without having a clear picture of the process and who will be involved.

The benchmarks and the assessment process should be part of a single ‘package’ that is brought to fruition through an open, balanced and transparent process and, then and only then, balloted to the USGBC membership. To separate them only arouses doubt – for even the most stringent benchmark will fail to ensure exemplary forestry if the assessment process is flawed.

Benchmark Content

LEED is meant to be a leadership standard—but the current benchmarks are nowhere near sufficient to identify leadership-level forest management. They are not even sufficient to consistently avoid the worst and most ecologically harmful forest management.

To put it another way, the benchmarks must be sufficient to weed out inadequate and misleading certification systems that have been certifying some of the worst logging and forest management practices in the US and Canada, and that certainly do not comprise

“leadership” standards. For more information, see the resources at www.credibleforestcertification.org

It is unclear how many of the benchmarks a certification system must pass to be accepted within the LEED system. We strongly recommend that 100% compliance be required—especially given that currently the benchmarks are not sufficient to consistently avoid controversial forestry practices, much less identify exemplary (“leadership”) forestry. If 100% compliance is not required, then compliance of at least 80% should be required in each of the major benchmark categories, with key benchmarks identified as mandatory, for which compliance is required regardless of the overall score. Benchmarks for which compliance should be mandatory regardless of the overall score are flagged below.

Some of the benchmarks are quite good. However, far too many are inadequate, and some important metrics are missing entirely. In the interests of time, our comments focus on where improvements are needed. Naturally, those benchmarks that are already sound should not be weakened as the benchmarks are revised.

Finally, we wish to emphasize in the strongest possible terms that the issues underlying our comments on the benchmarks – particularly those that we flag as mandatory below – are fundamental to meaningful forest certification and responsible forestry. While the details are technical, these are not mere technicalities that can be glossed over.

Conclusion

USGBC has become the standard bearer of the green building movement and is supported by many in the environmental community over competing green building rating systems in large part because LEED embodies strong reference standards. Credible forest certification is a cornerstone of LEED’s credibility.

The benchmarks need fundamental improvements to ensure that only leadership forestry practices are rewarded as part of the LEED system, and that LEED does not become inadvertently associated with the destruction of endangered forests and other controversial practices. The process by which the benchmarks are finalized and applied also needs to be clarified and strengthened. We make these suggestions in a constructive spirit with the aim of strengthening USGBC’s reputation as a quality organization dedicated to true leadership in green building standards.

Sincerely,

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