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A CHAPTER OF THE US & CANADA
GREEN BUILDING COUNCILS



September 2, 2008

Dear USGBC,

The Cascadia Chapter of the USGBC is pleased to respond to your invitation to comment on the proposed policy revisions for the Certified Wood credit(s) in the LEED rating system. The Chapter applauds the USGBC's long history of leadership on this important issue. To date, the Council's research-based approach and transparent public consultation process advocating for sustainably produced wood and wood products attaining LEED points is commendable, and the success of these actions to preserve and enhance forest health has spawned competitive brands in the market.

Cascadia is uniquely positioned to comment on this critical issue as a chapter of both the US and Canada Green Building Councils; our region comprises the most significant lumber producing area in North America, with the largest areas of habitat and biodiversity tied to this precious resource. Almost daily we are reminded that the economy of the Pacific Northwest is tied to the robustness of our forests – from the integrity of the salmon runs now seriously compromised, to tourism based on bringing visitors to our forests, mountains and streams. Without a functioning and bio-diverse habitat in alignment with sound forestry practices, our region would not be what it is today.

It is in this context that we are commenting on both the shift from third-party label recognition to benchmark criteria for the Certified Wood credit(s), and on the specific criteria that will comprise the proposed set of benchmarks and measurement protocols. Indeed, to maintain transparency in this process, the Membership vote should be based on full disclosure of the proposed protocol, rather than solely on the yet undefined concept of this change. Our Chapter would also like to formally volunteer to help more directly on this particular issue – especially given the intense regional nature of this LEED credit and the USGBC's commitment to regionalism. We have many Chapter members, Board members and Staff who are directly involved with multiple efforts surrounding green building and forest certification in the Pacific Northwest.

The driving force behind the creation of forest certification was the intention for a balance in forest management practices to account equally for environmental, socially equitable and economic prosperity in impacted areas. USGBC's commitment to "pursue robust triple bottom line solutions" not only mirrors this initiative, but it also correlates to USGBC's pledge to evaluate success in leadership using this evaluative means. The Forest Certification System Benchmark must, too, reward management practices that "create and restore harmony between human activities and natural systems", rather than condone business as usual or accept unprogressive standards. Cascadia believes that it is paramount to the success of the green building movement to transcend our current paradigms and seek the highest solutions possible.

Currently the Forest Stewardship Council (FSC) offers the best available standard for sustainable forestry practices and represents the work of a diverse coalition of individuals from all over the planet who, despite significant resistance from the timber industry, have succeeded in creating a standard that protects habitat while allowing for harvest. This is



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roughly analogous to the multi-discipline process that created LEED. We are seriously concerned that removing the specific reference to FSC or allowing standards that are in any way less stringent than FSC's own (as written, practiced and evaluated) will seriously upset progress – in the same way that detaching LEED from all of the city, state and federal mandates currently expanding throughout the country and replacing them with benchmarks based on multiple systems would damage the USGBC and slow real progress for green building. We have already seen the results of such actions in communities that recognize rating systems other than LEED: Given a choice, many choose the weakest of accepted standards to meet broad societal expectations.

In order to evaluate the success, on any level, of the proposed Forest Certification System Benchmark, we asked a panel of our membership if introducing a new protocol into the market is a valuable exercise. There was strong agreement that any proposed system must be progressive, and at the same time, not undermine other existing reputable programs. Our review also consistently resulted in the recognition that a single existing certification program's benchmarks should serve as the initial baseline criteria. Finally the group agreed that FSC should be the 'baseline benchmark' for these reasons:

- The report completed by the Yale Program on Forest Policy and Governance (YFPFG) makes a key point, stating that recognizing multiple systems will likely "lead the majority of firms to choose the lowest cost certification system, thereby supporting the growth of less stringent systems and their labels" and resulting in "minimal impacts on forest management". Surely, this is not the goal of a program that touts leadership in environmental design. Therefore, the initial Benchmark must be *very explicit* and based on a single certification program that is most stringent, most of the time.
- If the Forest Certification System Benchmark is formulated by pooling criteria from multiple systems using the more stringent available, it is possible that no products will immediately comply. This leads to the approach of an incremental benchmark, one that stems from a single certification program that is most stringent most of the time.
- The process of creating the compliance path must be at least as credible as the benchmark it is creating.

That said, Cascadia is not opposed to performance benchmarks that achieve the following three objectives:

1. Set the minimum compliance level at the current LEED threshold – the FSC standard – including third party verification and chain of custody. This would recognize only programs that meet or exceed the USGBC's established parameters for a wide spectrum of key issues and policy criteria.
2. Elevate benchmarks to be more stringent than FSC *over time* to encourage FSC – and all certification programs – to raise their own bar and allow for real competition based on *ratcheting up* the protection of habitat rather than ratcheting down, which is more common in competitive ventures where there is pressure to externalize costs and impacts. Integrating the changes into LEED 2009 would be impractical for practitioners and suppliers alike; this concept of releasing increasingly rigorous standards helps the industry to plan for the future and reduce uncertainty and downside risk.
3. Create a process that is completely transparent and allows input at all stages – in particular by 'wood producing' chapters directly (not merely through the Chapter Steering Committee) who are the on-the-ground connection to practitioners and the market.

Unfortunately, the proposal as currently outlined is problematic and does not capture the three points listed above. As a result, in its current form, this proposal is not supported by Cascadia, although we remain open and excited about benchmarks that actually raise the bar. We respectfully submit the



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following specific comments in the spirit of collaboration and the desire to see the USGBC continue to provide the leadership it has so effectively championed in market transformation.

It appears that this document, an exhaustive index of eighty-five key issues and policy criteria that shape timber certification, is an attempt to implement an “inductive” approach towards creating a new standard. However, the proposed benchmark solutions are not precise, and in some cases unknown, lacking the definition required to create an actual condition, rather than a theoretical concept, for measuring success. The majority of benchmarks can be classified into one of three primary categories:

- A. Those with no specific benchmark (whether because the topic is allegedly covered in another section, the topic is not considered to be significant, or it was noted that no specific benchmark exists);
- B. Those with a vague or unmeasurable benchmark; and,
- C. Those with a defined benchmark that challenges the USGBC’s principles or the Reference System itself.

A. No listed benchmark: More than one-in-four listed policy criteria lack a stated protocol. This is problematic because these issues distinguish status quo forestry practices from sustainable, or even ecologically aware, activities; guidelines must be provided to maintain a vigorous standard for all certification systems to uphold. Key issues ranging from Protected Areas, Old Growth, and Clearcutting to Economic Viability, Traditional Knowledge and Utilization directly impact timber harvest and the robust ecosystems from which the trees are taken. According to the comparative matrix compiled by YPFPG in Appendix A of the report, national indicators *do exist* which provide standards of care and define management expectations.

B. Vague Benchmark: A number of key issues have abbreviated and unclear benchmarks that have no measurable baseline. Each benchmark should be written with a straightforward directive, so all parties have a common understanding of the significance and intention of a compliant product. For example, the following benchmarks are indicative of ambiguous directives (emphasis added):

- Species Diversity: “**Promote** habitat diversity.”
- Timber Production: “Long term harvest levels are **sustainable**.”
- Reforestation: “Reforest in a **timely** manner.”
- Community Benefit: “**Respect** the traditional and legal rights of local communities...”

It is our belief that LEED was built on the premise of moving green building beyond such indefinite requirements as those cited above, and that holding to that premise for the certification of wood products is critically important for the integrity of the USGBC.

C. Faulty benchmark: One of the hallmarks of the USGBC is third-party certification, and the Certified Wood credit(s) relies on this independent oversight to maintain integrity. However, there are instances where this level of rigor is undermined with a broader base for acceptance. For example,

- Funding: Making funding sources publicly available does not necessarily equate to openness. The contrary is possible – and highly likely – if the financial flow is motivated by the potential to sway regulation to assuage private interests. In addition to publicizing monetary sources, there should be restrictions on funding that prohibit contributions from those directly impacted by the regulations.
- Verification of Acceptable Sources: Second-party claims are not sufficient to verify the legality of logging activities. If Third Party auditing is required per the Accreditation section of the System Benchmark, it should blanket the entire framework.



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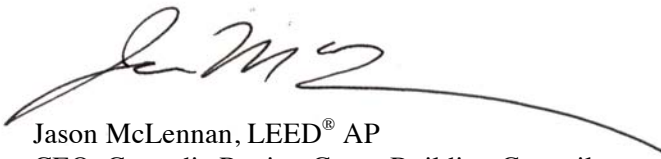
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We have completed a thorough analysis of the proposed benchmark criteria and welcome the opportunity to elaborate on our findings and present our concerns To the USGBC and/or its working groups. The leadership of the Cascadia Chapter is passionate about this issue and eager to assist collaborate with the USGBC on this issue which so deeply affects our four-state/province timber region.

Again, we applaud the concept of developing acceptable benchmark criteria for certified wood and value-added wood products, continuing the USGBC's market transformation of the building industry to use sustainable forest products in LEED certified projects. We look forward to continued involvement in these important changes to the LEED Rating System.

Sincerely,



Jason McLennan, LEED® AP
CEO, Cascadia Region Green Building Council



Clark Brockman, AIA, LEED® AP
Chair – Board of Directors, Cascadia Region Green Building Council
Associate Principal & Director of Sustainability Resources, SERA Architects, Inc.