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Achieving Environmental Health and Justice Where We Work, Live, and Play

September 7, 2008

Comments On Proposed Changes To Certified Wood Credits In LEED®

The Healthy Building Network endorses the comments that have been submitted by the Forest Stewardship Council, the Cascadia Region Green Building Council, and those submitted jointly by the Alliance of 13 environmental groups who have outstanding records of leadership in the protection of global forests and market transformation. We have reviewed suggestions these groups have made for improving the USGBC's proposed benchmark system and feel they well cover our range of concerns on technical aspects of the specific benchmarks. Therefore we saw no need to burden the Council with redundant comments in the online system. Because the online system did not provide an effective means for providing a broader framework of commentary, we are submitting this letter for your consideration.

We join these environmental, green building and forest products industry leaders in supporting the stated intent of the benchmark approach.

We share and emphasize their concern that the current proposal has significant fundamental flaws, both in technical specifics of the benchmarks themselves and in the process by which these benchmarks will be completed and applied.

There are two overriding points, however, that we feel warrant reinforcing. First on benchmarks, the number of benchmarks that are either ambiguously addressed or not adequately defined (for example, 18 are so identified by the environmental Alliance) or not addressed at all (a total of 14 more by the Alliance), is disturbing and alone sufficient to create a systemic problem that undermines LEED's goals of providing leadership in advancing forest protection.

The lack of comprehensive and rigorous benchmarks could lead to one of the negative outcomes identified by the expert report submitted to the USGBC by the Yale Program on Forest Policy and Governance, namely: *Lead the majority of firms to choose the lowest cost certification system, thereby supporting the growth of less stringent systems and their labels.* This would be a tragic turn of events, reversing the tremendous positive impacts that the FSC and current LEED standards have had on forests.

We emphasize this concern also because this policy will establish a precedent under which other product certification systems might be evaluated by LEED.

Second, the best efforts at benchmark creation will fail and forests will suffer without a good process for refinement, application and appeal. The USGBC has previously set a good precedent for openness and stakeholder engagement in this process. At this critical stage in the development of the process, it is more important than ever to keep those who share the USGBC's commitment to forest protection involved and engaged in the process. We support the proposal to keep the process open and public and to give the FSC and supporters at least an equal number of seats at the table to those carried by the PEFC groups.

We also share the concern that there is yet no proposal for how this benchmark system will be administered. Addressing capacity and process for this is critical before language based on this approach is inserted in to LEED credits.

These issues are critical to LEED maintaining the leadership that the system's name reflects. The overriding support for the USGBC and LEED expressed by these commentators demonstrates the overwhelming support the organization will enjoy from a cross section of its members and other stakeholders, including leading businesses in the forest products industry, if it maintains its leadership position.

Sincerely,

A handwritten signature in black ink that reads "William C. Walsh". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Bill Walsh
Healthy Building Network