

PERKINS
+ WILL

Memo

To: Green Building Stakeholders

From: Perkins+Will Certified Wood Sustainable Design Initiative Sub-Committee
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Date: August 29, 2008

Subject: **URGENT: Proposed USGBC Downgrades to MRc7 (Certified Wood) in LEED
Comments Needed by Non-Members and Members of the US Green Building Council**

Submit Comments On-line to the USGBC by Sunday, September 7, 2008, 5:00p PDT
<http://www.usgbc.org/LEED/LEEDDrafts/RatingSystemVersions.aspx?CMSPageID=1458>

Proposed USGBC Forest Certification Benchmark (DRAFT):
<https://www.usgbc.org/ShowFile.aspx?DocumentID=4374>

Attached: Perkins+Will Benchmark Comments and Guidance on Commenting

The US Green Building Council (USGBC) has prepared a number of revisions to the Certified Wood credit in all LEED rating systems. A thorough review by the Perkins+Will Certified Wood Sub-committee has found that the revisions will greatly diminish the criteria for certifying forests in the U.S. and around the world.

A strong Certified Wood Credit is important because the health of our forest eco-systems and their inhabitants is vital to the health of our planet and our civilization. Forests cover 30% of the world's land area and store over 50% of the world's carbon. The LEED Certified Wood credit must continue to address the three core elements of Sustainability; Environment, Economics and Social Equity. It should embody the Precautionary Principle, require continuous improvement and retain rigorous requirements founded on the best available objective science.

Your organization can play an important role in letting the USGBC know that the proposed revisions are clearly not appropriate for a leadership organization and they are not in the best interest of society, the environment or the economy.

We have attached our comments and proposed revisions and encourage you to follow our lead. Perkins + Will feels that the USGBC should maintain a strong performance standard for Wood Certification in the LEED rating system.

Please feel free to use our comments in preparing your response.

DETAIL ON THE PERKINS + WILL REVIEW COMMENTS

A committee of Perkins+Will green team leaders from around the U.S. and Canada have performed a detailed review of the proposed USGBC Forest Certification System Benchmark, and determined that it is substantially lower than the current Forest Stewardship Council (FSC) standard for certified wood, especially in substantive areas, such as:

1. **Carbon Storage** – The proposed benchmark states: “No specific benchmark - No measurable requirements found in existing schemes.”
 - *Perkins+Will Revision: Maintain and appropriately enhance forest resources and their contribution to global carbon cycles according to the best available science and emerging research. (ie. Intergovernmental Panel on Climate Change and the Pew Center on Global Climate Change.) (Note: This is a higher requirement than FSC.)*
2. **Old Growth** – The proposed benchmark states: “Other benchmarks contained in the ecosystem-based criteria address this issue - no specific benchmark has been established.”
 - *Perkins+Will Revision: Use Forest Stewardship Council Criteria: Define old growth in regional standards. In old growth that is not High Conservation Value Forest, maintain or recruit old-growth trees. Limited harvest permissible. No active management of intact and un-entered old growth stands (defined at regional level) unless for ecological enhancement of High Conservation Value Forest features, except tribal lands.*
3. **Clear cutting** – The proposed benchmark states: “Other benchmarks contained in the ecosystem-based criteria address this issue - no specific benchmark has been established.”
 - *Perkins+Will Revision: Use Forest Stewardship Council Criteria: Clear cutting retains trees consistent with patterns of natural disturbance. Plantations: Clear cuts without tree retention limited to 40 acres unless justified by scientifically credible analysis. Regeneration reaches at least 10 feet or canopy closure before adjacent harvest. Buffers with native species maintained between units.*
4. **Aboriginal Land and Tenure Rights** – The proposed benchmark states: “Respect the traditional and legal rights of indigenous peoples to their lands and resources. Free and informed consent of the indigenous peoples is required for other parties to manage or use such lands and resources.”
 - *Perkins+Will Revision: Use Forest Stewardship Council Criteria: Indigenous peoples control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies. Forest management doesn't threaten or diminish indigenous rights and resources.*

Proposed revisions include modifications to the credit language for LEED for New Construction, Schools, Commercial Interiors, Core and Shell, Existing Buildings and Homes. The credit language revisions will refer to a new “US Green Building Council’s Forest Certification System Benchmark.” Wood certification programs (such as FSC and SFI) that are, after thorough analysis, deemed compliant with this benchmark would be recognized by LEED.

The USGBC is seeking comments, until September 7, 2008, 5:00 pm PDT on the [proposed Benchmark text](#) and on the [credit language revisions](#). (comments to be made via the following URL: <http://www.usgbc.org/LEED/LEEDDrafts/RatingSystemVersions.aspx?CMSPageID=1458>)