



CASCADIA REGION GREEN BUILDING COUNCIL
A CHAPTER OF THE U.S. GREEN BUILDING COUNCIL

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To: US Green Building Council Board of Directors, LEED Steering and PVC TSAC Leadership
Attn: Rick Fedrizzi, President & CEO

From: Board of Directors, Cascadia Region Green Building Council
A Chapter of the US Green Building Council

Date: February 15, 2005

Dear President Fedrizzi, respected USGBC Board Members and TSAC leaders,

On behalf of the entire Cascadia Region Green Building Council Board of Directors, we respectfully submit the following comments in the interest of strengthening the mission of the US Green Building Council and its constituent chapters. Several issues in the past year have shown us that strong policy and value guidelines are needed to help steer USGBC through difficult issues. Examples including the Trade Associations membership debate, proposed LEED-NC v.2.2 credits for Renewable Materials, and proposals for LEED credits for PVC reduction are all issues that are eliciting strong opinion and differences in conclusions. At a higher, systemic level to the organization, there is a lack of guidance from the USGBC Board in setting policy for USGBC committees and task forces to make decisions in the interest of public health and welfare, and the promotion of green buildings with the ultimate goal being a more sustainable, prosperous and equitable world.

Without specific principles and guidelines in place, each Committee or Subcommittee in the USGBC family is adrift in assessing its progress towards overall goals. Certain principles do exist that are worth consideration and quite suitable for adoption. In fact, the USGBC's own white paper on the implementation of green buildings in the marketplace (1997) concluded that adopting a "Vision of Sustainability" was crucial to the mission and success of the organization. It named the Natural Step as one example of such a vision that would be worth adopting. The time for a fully articulated vision is now.

In the interest of advancing this process the Cascadia Board offers the following observations and recommendations for action:

Point 1

Without guiding principals, such as the Natural Step, Hanover Principles, CERES principles, etc, the USGBC will be constantly searching for policy in determining whether its actions and programs are moving towards a sustainable society. The Cascadia Board will include this item for discussion on our March agenda. Adoption of such guidelines work hand in hand with the LEED programs and the mission of USGBC. Our board will be happy to share with you the results of our process and decisions that arise from our next meeting.

Point 2

The strategy of combining Life Cycle Assessment and Risk Assessment in the PVC credit review, while interesting as an approach, is creating a process that seems to be outside the intent of the original LEED program. Normally, this sort of scientific methodology is adopted from a third party organization. There have been enough dissenting comments questioning the credibility of this approach that it may pose serious problems to USGBC's own standing in the environmental community. This also affects the credibility of each chapter and the relations they have built with other nonprofits in their region. Cascadia members, who are also members of the USGBC, have expressed concern over the choice of appraisal methods and the conclusions that it has produced in the case of the Draft PVC credit review. We ask that the USGBC Board and the LEED Steering Committee reconsider the policy of creating internal scientific methodology to make decisions and set criteria. Instead, USGBC should explore the underlying fact that this matter is less about technical and scientific issues than it is about core values and principles. Perhaps USGBC should search for an existing reference standard to apply regarding PVC rather than becoming a standards setting organization itself.

Point 3

Although the TSAC Draft PVC and Vinyl Report is open for comment and not yet resolved, the Vinyl Institute has already co-opted the conclusion for their own purposes. They are claiming vindication for their product on their website. We find this premature and unconscionably misleading. The USGBC has the responsibility to demand that the Vinyl Institute cease using this report until it is complete and final. They and other industry trade associations have also joined in a group to co-opt the good name of green building in an organization called the North American Coalition on Green Building. This sort of activity is clearly adversarial and should be addressed immediately by the USGBC Board of Directors.

Point 4

Because of the premature and misleading conclusions being dispersed by other organizations, and because of the many objections from within the USGBC membership, the Cascadia Board requests that the conclusions of the Draft PVC Report be formally rejected as official policy of the organization until further study and additional comment is made. The process that produced this report though heroic in effort - remains in question as is the formative policy behind it. If the discussion is limited to simply the comments being collected by February 15, this report will be incomplete and unacceptable to much of the membership in the Cascadia Chapter and will present a situation of conflict within the organization. This must be avoided at all costs as it is exactly what opposing organizations can use to divide us. We suggest you extend the Comment Period by a minimum of another 60 days or allow acceptance of new issues during a second Comment Period in order to have a more successful process.

In summary, the Cascadia Board is submitting this letter to the USGBC Board, relevant senior staff and TSAC leadership to state that a "do-nothing" conclusion regarding PVC is ill-advised. We collectively must acknowledge that deciding to take no action in this matter will clearly still involve significant consequences.

These problems will be repeated over and over with each separate issue unless the USGBC adopts coherent policy on sustainability and identifies clear indicators in the progress towards such a goal. A summit of all National and Chapter Leaders is warranted as this involves the very future and credibility of our organization. The Cascadia Chapter is willing to send a delegation to the USGBC Board to help resolve this critical issue.

Thank you for your consideration in this serious matter.

The Board of Directors
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