



**SF**Environment

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U. S. Green Building Council  
Technical and Scientific Advisory Committee and USGBC Board  
1015 18th St. NW, Suite 805  
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February 14, 2005

Dear Members of the Task Group and of the Board,

This letter is in support of our accompanying submission in response to the US Green Building Council's Solicitations for Comment on the draft report, "Assessment of Technical Basis for a PVC-Related Materials Credit in LEED."

The City and County of San Francisco is an engaged member and supporter of the USGBC. We are proud to be one of the first municipalities of our size to commit to applying the LEED Silver standard to all of our municipal construction projects through our Resource Efficient Building Ordinance. Working with the USGBC and LEED has been very much in harmony with our Environment Department's mission to "to improve, enhance, and preserve the environment and to promote San Francisco's long-term environmental well being."

Complementary to our green building work with LEED has been our long-standing effort to reduce the use of products that either contain hazardous ingredients or are responsible for the release of hazardous chemicals. Informed by the precautionary principle, we are committed to using the best science available to select materials that present the least potential threat to human health and natural systems across their life cycle. Instead of asking whether a particular product presents an **acceptable** level of impact to human health and environment we ask whether using that product is **necessary** and whether **safer or more environmentally preferable alternatives** exist.

In keeping with a precautionary approach, San Francisco seeks alternatives that reduce the release of persistent bioaccumulative toxic chemicals (PBTs), focusing first on agreed upon national and international priority chemicals such as dioxin and the other persistent organic pollutants (POPs). We feel this policy is very much in line with LEED's mission to "accelerate global adoption of sustainable green building and development practices". We believe that such an **alternatives assessment approach** to product or material selection is a robust model to achieve sustainability goals and we look forward with anticipation to the TSAC's work to bring this important missing element in to LEED.

We also take very seriously our responsibility to reduce waste through recycling and source reduction. San Francisco has already met and surpassed the state-mandated 50 percent recycling goal, and is well on its way towards attaining 75 percent diversion with the ultimate goal of zero waste by 2020 set by the Board of Supervisors in 2002.

It was, therefore, with dismay that we learned that the USGBC has produced a report with the intent to address the evidence for a PVC related credit that appears to entirely ignore both the critical national and international environmental health priority of elimination of priority PBTs *and* waste reduction, along with a number of other critical issues of concern related to PVC's environmental performance. The TSAC report is an important opportunity for the USGBC to continue in its important role of defining the standards for sustainable green building and development practices in line with these priorities. By ignoring the critical issues of PBT and waste reduction, the USGBC is not only missing an opportunity, but is contributing to confusion in the marketplace and undermining the work of government bodies like ourselves and other entities that are working on these priorities.

Like the USGBC, the City seeks to determine the best materials to use within a green building program. As such, we recently contracted for a study of plastic pipes that we think provides an important model for the USGBC to consider in how to address the critical priorities that the TSAC report misses. Like the TSAC report, the City report focuses on just a portion of the PVC building material market, plastic pipes in this case. Plastic pipe was selected because of its wide use in the building industry and with the hope that the methods developed for this comparison would serve as a foundation for other plastic materials.

Unlike the TSAC report, San Francisco's alternatives analysis of PVC explicitly identified the key City environmental priorities associated with plastics use and then designed the analysis to insure that those priorities would be addressed. Further, the Task Group seemed to have serious trouble coming to conclusions in part because of the many gaps and uncertainties in the data on releases of hazardous chemicals from building materials and their direct measurable impact on particular human health outcomes. Elimination of priority hazardous chemicals is not an environmental policy objective that Life Cycle Analysis or Risk Assessment tools are well designed to address, nor is future recyclability. However, alternatives assessment allows toxics reduction and recyclability to be considered in a transparent and concrete manner and decisions made based on comparative scoring.

Hence the City's use of an alternatives analysis approach provides the careful comparison of various plastic materials. A straightforward screening approach, with defined criteria, identifies the association of specific plastics with chemicals that have been prioritized for elimination. It then evaluates the potential for recycling these plastics and preferentially orders them using the criteria. The results of these preferential criteria screenings are then subjected to an evaluation of performance requirements for specific applications to insure that the materials will meet the City's needs and availability in the marketplace.

This methodology of combining specific human health, environmental, end-of-life, and performance criteria has numerous advantages over the TSAC methodology. In addition to being tuned directly to key environmental priorities that have been identified for these plastics, it is relatively straightforward, transparent, and replicable and provides clear guidance to designers of buildings and of building materials.

We are attaching our draft report on plastic pipes along with this letter for your review and consideration. Please note that this report is in the process of being peer reviewed and we welcome any comments or suggestions as to how to improve the methodology or data used in the analysis.

We strongly urge the USGBC to reconsider the approach taken by the TSAC report. We suggest a re-evaluation of PVC using an **Alternatives Assessment screening approach** to the high hazard chemicals around which global environmental consensus has formed for elimination as well as end of life considerations. It is critical that the USGBC not shrink from its all-important mission to lead market transformation at this juncture. The evidence of likely harm is clear. It is time to act on the issues of priority hazardous chemicals and provide clear guidance to the market.

Sincerely,

A handwritten signature in black ink, appearing to read "Jared Blumenfeld". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jared Blumenfeld  
Director, San Francisco Department of the Environment