

13 March 2010

Mr. Rick Fedrizzi
Mr. Scot Horst
LEED Steering Committee
U.S. Green Building Council

**Re A+D Sustainable Design Leaders:
Maintain FSC Level as Minimum standard for Certification Benchmark**

Dear Rick, Scot & Members of the LEED Steering Committee,

The A+D Sustainable Design Leaders Group was formed in 2008 and represents approximately 50 of the largest architecture and design firms in the country, over 17,000 staff, 6,600 LEED AP's, and more than 1,400 LEED registered projects. The group meets annually for a leadership summit, where we discuss major issues on sustainable design, and exchange new ideas. Our regional groups meet regularly throughout the year, and our on-line forum enables us to continuously share our expertise to further advance environmentally responsible design practices.

In keeping with the USGBC's objectives, as LEED has expanded and evolved, it has become more rigorous with each version. We feel that the proposed revisions to MR Credit 7 should uphold these same principles of raising the bar and moving towards more stringent criteria in response to our expanding global environmental crisis. The proposed credit revisions and forest certification benchmark draft in their current form do not. In fact, we feel that they are far more permissive than the current FSC certification requirements. The previous public comment draft was generally acceptable to us, while this third public comment draft has eroded the requirements to a level that concerns us greatly.

We appreciate the effort the USGBC has invested in addressing the question of certified wood. Opening up the possibility for other certification bodies to participate will create healthy competition, as well as potentially lower prices and encourage more stringent forestry management practices. While the proposed revisions to Credit MR 7 and the associated Forest Certification Benchmark may achieve increased competition and lower costs, as currently proposed they appear to weaken current sustainable forestry management requirements.

It is for this reason that the A+D Sustainable Design Leaders Group supports the FSC level being used as the minimum compliance level for the benchmark, including the independent third-party and chain of custody criteria.

This would still meet the objective of encouraging other certification programs and competition, as long as they meet or surpass this baseline. Using FSC standards as a minimum baseline coupled with competition will help the forestry industry to evolve beyond current practices and promote broader sustainable forestry initiatives.

As well, we feel that it is important to strengthen the governance and conformance processes in assessing and assuring the integrity of accepted forest certification systems. An unbiased structure is imperative in the governance process, where decision-making is organized such that for-profit industry associations do not hold the balance of power. In addition, the conformance assessment process needs

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clearer definition and member input.

The necessity for responsible stewardship of the world's remaining forests cannot be emphasized enough. Each year, approximately 32 million acres--an area nearly equal to the size of Florida--are lost to deforestation. Deforestation is the second leading contributor of carbon emissions worldwide, contributing 20 to 25 percent of all carbon pollution. In addition, forests are home to complex ecosystems that support human health, community and economic development. At the Copenhagen Summit last December, reforestation was recognized as one of the most effective and least costly means of curbing atmospheric CO₂-e and combating climate change.

In summary, we call for the following:

1. That the FSC level be used as the minimum compliance level for the benchmark;
2. That prescriptive requirements regarding governance be outlined to ensure appropriate balance of environmental, social and economic sustainability interests;
3. That the conformance assessment process be defined with clear procedures to be evaluated by members;
4. That the above comments be incorporated into a fourth draft and subsequent round of public comments;
5. Members of our group are available to work with or vet the fourth draft before it is released.

We are individually signing up to join the consensus body, and will oppose this initiative in the voting process if these issues are not addressed. We hope that you consider our collective efforts in preparing these comments as an indication of our deep concern for the state of the world's forests, and any one of us can coordinate communications between you and the whole group if you would like to engage in a direct dialogue with us.

Sincerely,

The A+D Sustainable Design Leaders
Group

cc. USGBC Board of Directors

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The A+D Sustainable Design Leaders Group

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