

OFFICE OF THE GOVERNOR
STATE OF MONTANA

BRIAN SCHWEITZER
GOVERNOR



JOHN BOHLINGER
LT. GOVERNOR

October 27, 2009

Mr. Richard Fedrizzi
President and CEO
U.S. Green Building Council
2101 L St. NW, Suite 500
Washington, D.C. 20037

Dear Mr. Fedrizzi:

Montana's forests are a key to our State's social, environmental, and economic vitality. The state is actively involved in the development of alternative energy, conservation, and construction initiatives in which sustainable forests play a critical role. Montana sees the benefit of encouraging energy and natural resource conservation in all forms of new construction and retrofit, and appreciates that the US Green Building Council (USBC) is encouraging this approach as well.

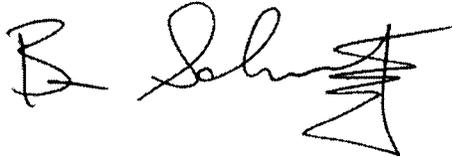
That said, I find very little in the most recent draft of the USBC benchmarks for forest certification that support these state efforts. Under the draft benchmarks, virtually none of the nearly 20 million acres of Montana's public and private forest lands would qualify for LEED credits. This ignores the fact that Montana's Department of Natural Resources and Conservation lands, as well as the privately held timber lands in the state, are harvested under a nationally-recognized system of Best Management Practices (including mandatory protection of Streamside Maintenance Zones), and are subject to semi-annual interagency audits which are made public. The state is also in the final stages of agreeing to a Habitat Conservation Plan developed collaboratively with the United States Fish and Wildlife Service to ensure long term protections for ESA-listed wildlife species in western Montana. The 50-year commitment would apply to over 500,000 acres of managed state forest land.

Under the proposed benchmarks, bamboo from China and Forest Stewardship Council (FSC) certified wood from Russia and Brazil would be certified, whereas Montana wood would not. I am confident Montana's environmental protections exceed those of China and Russia. In addition, additional energy and emission of greenhouse gasses would be created by transporting these products across vast distances, compared to using Montana-made forest products.

I believed it was the intent of the USGBC to include all currently recognized 3rd party certification benchmarks. The current draft's almost exclusive focus on FSC standards does not allow that flexibility. I suggest the benchmarks should also include other 3rd party certification such as the Sustainable Forest Initiative (SFI), and demonstrated and transparent sustainable forest management models such as those used on state trust lands.

The goal of these benchmarks should be to ensure construction with sustainable building products that are manufactured as close to the building site as possible. We in Montana are proud of the demonstrated environmental record of the forest managers and industry in our state particularly in regard to the management of our state forests. Again, I urge that final standards issued by USGBC be revised to include recognized 3rd party certification benchmarks.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Schweitzer". The signature is stylized with a large initial "B" and a long, sweeping horizontal line that ends in a sharp downward stroke.

BRIAN SCHWEITZER
Governor

cc: Ellen Simpson, Montana Wood Products Association.