



State of Oklahoma
Department of Agriculture, Food, and Forestry
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Brad Henry
Governor

Terry L. Peach
Secretary and Commissioner

February 8, 2010

Mr. Richard Fedrizzi, President and CEO
US Green Building Council
2101 L Street NW, Suite 500
Washington, DC 20037

Dear Mr. Fedrizzi:

For several years, I have watched the US Green Building Council's efforts in promoting environmentally responsible architectural, engineering and construction practices. The LEED standards are important in that so many institutions and organizations rely on them in making decisions of what is considered "green" and what is not. I have always had some concerns regarding the "favor" that some non-renewable products have been given over renewable wood products in the standards and am pleased that the USGBC is re-thinking its consideration of wood products from sustainable well-managed forestlands.

Oklahoma's forest industry is committed to forest sustainability. For many years growth has exceeded removals throughout our state's commercially forested region and the ecological benefits of our forests are still extremely high and increasing. There are a number of 3rd party certification procedures in place in our state, including the Tree Farm System and SFI. In addition there is an active Master Logger program and BMP programs administered by the state. Our studies have shown that compliance to Best Management Practices (BMP's) on all lands has been within acceptable limits; however, the compliance level on certified properties and on harvesting operations carried out by certified operators has been and continues to be outstanding.

The issue I currently have is that the new LEED standards show great preference toward FSC certification, to the virtual exclusion of all other 3rd party forest sustainability certifiers. Most of the industry in our state has opted to certify under SFI or Tree Farm certification processes. I do not agree that FSC is the only standard that will meet the USGBC's intent of assuring sustainability and good forest stewardship. I believe that excluding all but FSC certification to obtain LEED credits will force the US building industry into the global market for its wood products. This undermines the efforts of the USGBC given the energy required to move resources from South American and Asia to the US market.

With this in mind, I encourage you to consider all of the leading 3rd party certifications that exist in the same light when applying the LEED standards and promote the use of U.S. grown wood products where previously you have promoted plastics, concrete and steel.

Sincerely,

John Burwell, Director & State Forester
Oklahoma Department of Agriculture, Food and Forestry