



C. L. "BUTCH" OTTER
GOVERNOR

May 24, 2010

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

Dear Mr. Fedrizzi,

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

However, I find very little in the most recent draft of the USBC benchmarks for forest certification that supports Idaho's efforts. Under the draft benchmarks, much of the nearly 20 million acres of Idaho's public and private forest lands would not qualify for LEED credits. The draft ignores the fact that Idaho's State and privately held timber lands are harvested under a Forest Practices Act provision requiring use of nationally recognized Best Management Practices (including mandatory protection of Streamside Maintenance Zones) and semi-annual interagency audits which are made public. The State also is in the final stages of agreeing to a unique Endangered Species Act Cooperative Agreement developed with the United States Fish and Wildlife Service and NOAA Fisheries to ensure long-term enhancements for ESA-listed fish species in Idaho.

Under the proposed USBC benchmarks, bamboo from China and Forest Stewardship Council (FSC)-certified wood from Russia and Brazil would be certified, whereas only some of Idaho's wood would be certified. Much would not, including wood produced from Idaho's State endowment trust lands that are managed on a sustainable basis to generate revenue for a variety of beneficiaries, most notably Idaho's public school system. I am confident that Idaho's environmental protections exceed those of China and Russia. Moreover, additional energy and emission of greenhouse gasses would be created by transporting these products across vast distances compared to using Idaho-made forest products.

I understood it was the intent of the USGBC to include all credible forest management benchmarks. The current draft's almost exclusive focus on FSC standards does not allow that flexibility. I suggest the benchmarks also should include other third-party certification, such as the Sustainable Forest Initiative (SFI) and demonstrated and transparent sustainable forest management models such as those used on State endowment trust lands in Idaho.

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 Idaho 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 the final standards issued by USGBC be revised to include recognized third-party certification benchmarks. Thank you for your prompt and positive consideration.

As Always – Idaho, "Esto Perpetua"

A handwritten signature in black ink that reads "C.L. Butch Otter".

C.L. "Butch" Otter
Governor of Idaho

CLO/bb