

Florida Department of Agriculture and Consumer Services  
CHARLES H. BRONSON, Commissioner  
The Capitol • Tallahassee, FL 32399-0800  
www.doacs.state.fl.us

Please Respond to:  
Florida Division of Forestry  
3125 Conner Boulevard  
Tallahassee, Florida 32399-1650  
Phone: 850-488-4274

December 2, 2009

Mr. Richard Fedrizzi  
President/ CEO  
US Green Building Council (USGBC)  
2101 "L" Street, NW, Suite 500  
Washington, DC 20037

*cc: USGBC Board*

Dear Mr. Fedrizzi:

In September the US Green Building Council (USGBC) released the second set of draft benchmarks to assess forest certification standards in its LEED green building rating system. Currently the LEED program awards one point for wood that is certified to the Forest Stewardship Council (FSC), thereby excluding the majority of certified wood from hundreds of communities across the United States.

Our concern is that the current draft benchmarks appear to be more of a justification for the USGBC to maintain its exclusive policy of favoring FSC only; rather than an attempt to fairly assess and include all credible forest certification programs as well as wood from well-managed US forests. With only 18% of the US forests certified to any forest certification standard, we believe USGBC needs to embrace, reward, and recognize all forest certification programs in the USA.

I am specifically concerned that:

1. The USGBC only requires wood-based raw materials to demonstrate its environmental and social pedigree but does not ask the same of competing materials.



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2. Less than 10% of the world's forests are certified to any of the three credible forest certification programs in the US: the Sustainable Forestry Initiative (SFI), the Forest Stewardship Council (FSC) and the American Tree Farm System (ATFS). The draft benchmarks will only serve to maintain the status quo of the USGBC's FSC only policy, thereby excluding SFI and ATFS certified wood products from our State's forests and our Communities. Because FSC is a global standard (with little certified wood in the US), the USGBC would be providing more incentive for products such as FSC bamboo from China and FSC certified wood from Russia or Brazil over wood from the United States certified to the SFI and ATFS.
3. One could argue that FSC has a bias toward foreign wood over domestic U.S. wood if you look at how difficult the FSC requirements are to achieve in the US compared to the requirements of FSC standards for other nations such as Brazil, Sweden, Russia and China – yet forest products trade globally, and achieving FSC in the US comes at a higher cost to US producers. No wonder there is so little timberland certified to FSC in the USA. This makes no sense for the environment or market. The excessively greater burning of fossil fuels required to transport this distant foreign wood vs. the relatively minor transport fuel use required to bring locally grown wood to market is self-evident. How environmentally friendly is it to power diesel-burning freighters half-way around the world from China when we are literally growing 2x4s right in our own backyards here in the U.S.? How serious can USGBC really be about the environment if USGBC continually chooses to ignore the big picture implications of recognizing FSC wood only for the forest certification credit?
4. Green building rating systems around the world support all credible third-party forest certification schemes. For example, Green Globes (US and Canada), BREEAM (United Kingdom), Built Green Canada, Built Green Colorado, CASBEE (Japan), the ANSI National Green Building Standard (US), the General Services Administration (US) recognize both SFI and FSC. Furthermore, governments around the world also recognize all credible certification systems, including the US, the UK, Japan, Germany, France and Canada, to name a few. The USGBC is falling behind other credible green building programs and appears to be allowing politics, rather than facts, form the basis for its policies; as a result it is becoming increasingly difficult to support the USGBC.

We are very proud of the environmental record of the forest products industry in our state and our inclusive approach to forest certification. The State of Florida currently has 2,232,025 acres certified under the SFI and ATFS programs, and only 119 acres certified under FSC. If the final benchmarks issued by USGBC contain the same restrictive language as they do now, it will virtually eliminate Florida wood from receiving a point from the LEED system.

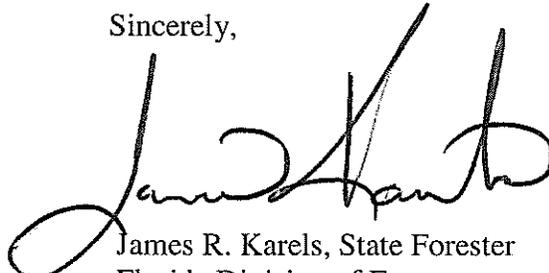
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We are aware that you are planning on providing an alternative path life cycle analysis approach that will definitely put wood products in a better position and we applaud this initiative. Nonetheless, the forest certification wood credit will still exist and must be revised promptly to give one point for legally sourced well-managed wood, and at least an additional point for wood that has been third party certified.

We also recognize that local raw materials can get a point under LEED, but wood from our State often is shipped more than 500 miles which is the maximum shipping radius set by USGBC to allow it a point. We believe wood from our State should be recognized for at least a point under LEED, and wood from our State certified to any forest certification standard including SFI, FSC, and ATFS should get an additional point given the effort that has gone into preparing for and conducting a third party independent certification audit.

I urge you to quickly make a board-decision to recognize well-managed wood from our state as well as all credible forest certification programs, including SFI, FSC and ATFS. In doing so, USGBC can join other government agencies and green building rating programs in their recognition of wood as an environmentally friendly building material and in their recognition of all credible forest certification standards.

Sincerely,



James R. Karels, State Forester  
Florida Division of Forestry

JRK/jdc/vr

cc: Alan Shelby, Director, Government Relations  
Florida Forestry Association