

Congress of the United States
Washington, DC 20515

July 19, 2012

Daniel M. Tangherlini
Acting Administrator
U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405

Dear Administrator Tangherlini:

We are pleased that the General Services Administration's (GSA) evaluation of green building certification systems, as required by the Energy Independence Security Act of 2007, recognizes that more than one certification system aligns considerably with federal high-performance green building principles.

The evaluation identifies two certification systems that best align with federal requirements. The Green Globes certification system aligned best for new construction while the Leadership in Energy and Environmental Design (LEED) system aligned best for major renovation. These findings support the conclusion that more than one certification system should be recommended by GSA especially when both certification systems aligned with the same overall number of federal requirements for green building.

As such, we urge GSA to make a recommendation similar to the 2010 Department of Energy (DOE) proposed rule on green building certification systems. This approach would allow multiple certification systems to qualify by listing criteria.

In 2006, GSA exclusively chose LEED at the conclusion of its last evaluation. Since that time, we have expressed strong concerns to GSA about LEED's discrimination against U.S. wood products. Under the LEED certified wood credit, 75 percent of U.S. certified timberland is not recognized as worthy of credit. LEED excludes two of the largest, independently-audited forest certification programs in the United States – the Sustainable Forestry Initiative (SFI) and the American Tree Farm System (ATFS). Over 86 million acres of forests in the United States are SFI or ATFS certified. Further, the exclusion is not science-based and encourages the use of foreign-sourced wood (e.g. Russia and Finland), whose forestry practices are not as stringent as those in the U.S.

In addition to our concerns with LEED's certified wood credit, the current LEED certification system fails to recognize the importance of life cycle assessment of building materials. This means that there is little opportunity in the LEED system for a science-based comparison of the environmental impact of various building materials to account for sustainable use of water, energy and other natural resources. As a result, the environmental benefits of wood are not recognized.

In response, GSA representatives have previously noted that not much wood is used in their building projects. This is a disappointing response especially given how many U.S. jobs are impacted. Since

2005, the wood products manufacturing industry, an industry that employs more Americans than the automotive manufacturing industry, has lost 20 percent of its jobs and nearly \$9 billion in wages. No federal agency should recognize a certification system, regardless of impact, that arbitrarily disadvantages domestic products, especially when the certification system is not consistent with OMB Circular 119. GSA's building decisions often set trends. Those trends have an impact beyond the federal government and influence the private sector. Accordingly, GSA should promote competition, and ensure that private green building certification systems do not disadvantage the U.S. wood products manufacturing industry.

In addition to adopting DOE criteria, we believe the process should emphasize OMB Circular A-119 and the "National Technology Transfer and Advancement Act of 1995" (P.L. 104-113), which call for green building certification systems developed through a consensus process where meaningful participation provides commenter's with the opportunity to present the merits of their comment to a balanced committee of affected parties. We also believe preference should also be given to certification systems that use Life Cycle Assessment for reasons we previously mentioned.

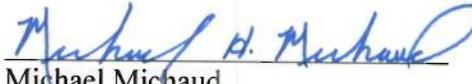
Sound policy, peer-reviewed science and a complete evaluation of available information (including Green Building Initiative's Federal Guiding Principles) should be included. We request a full briefing including steps GSA will take to adopt the approach taken in the DOE proposed rule, and the complete evaluation of available information.

Thank you for your attention to this important matter.

Sincerely,



Rodney Alexander
MEMBER OF CONGRESS



Michael Michaud
MEMBER OF CONGRESS



Tim Holden
MEMBER OF CONGRESS



Jo Bonner
MEMBER OF CONGRESS



Jeff Denham
MEMBER OF CONGRESS