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October 16, 2009

U.S. Green Building Council  
1800 Massachusetts Avenue, NW  
Suite 300  
Washington, DC 20036

To Whom It May Concern:

The State of Maine, the most forested state in the country, applauds the U.S. Green Building Council (USGBC) for promoting environmentally sound building standards. I submit the following comments regarding the USGBC Forest Certification Benchmark.

The State of Maine has a vibrant, resilient, and diverse forest products industry cluster. We are a national leader in certification of forest lands, forest management, and forest products chain of custody. We are persuaded that independent third party certification of forest lands improves forest management in many ways. Maine's certification efforts recognize the certification programs that are accepted by the market place. In Maine these include American Tree Farm System, Forest Stewardship Council, Sustainable Forestry Initiative, and, under certain circumstances, wood harvested by loggers certified to the Northeast Master Logger Certification standard (aka Master Loggers).

I strongly encourage USGBC to ensure that its proposed Forest Certification Benchmark accommodates all of the major forest certification schemes recognized in the marketplace. At this time, we are not convinced that this is the case. USGBC may have set the bar so high that none of the existing forest certification programs could qualify today.

In addition to the comments above, we offer the observation that the LEED standard still does not give adequate recognition to the use of certified wood (as we suggested in a letter regarding revisions to the LEED standard a couple of years ago).

We continue to encourage USGBC to fully and amply recognize in its rating systems the use of wood obtained from forests certified by independent third parties as well managed. Wood is the environmentally preferable choice of building materials for a number of reasons, including but not limited to:

1. Wood is a renewable resource within the human life span.
2. Production of wood from forests like Maine where natural regeneration is abundant and forests are grown without fertilization requires little human intervention, other than thoughtful and careful harvesting. This stands in stark contrast with other renewable materials from agriculture sources.



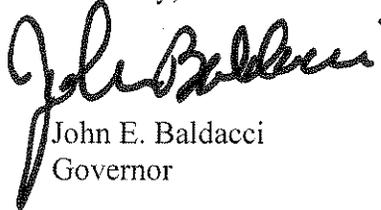
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3. Wood products generally have less embedded energy and result in lower pollutant emissions than comparable building products – these include, but are not limited to, lower carbon dioxide emissions than other building products. For example, it requires ten times as much energy to produce a steel 2x4 as one made from wood. Likewise, manufacturing bricks and concrete requires many times more energy to manufacture than a comparable amount of wood used in construction. Information from independent sources also demonstrates that wood generates far less in the way of air and water pollutants than these other materials as well.
4. The active, sustainable management of forests results in the joint production of many other non-market goods, services, and values for society, including clean air and water, fish and wildlife habitat, and recreation.

I encourage you to include a full accounting of wood's benefits in the LEED rating systems (i.e., the reduced emissions and co-benefits outlined above), and where scientific evidence demonstrates that wood is superior, to place a greater emphasis on wood products from sustainably managed forests.

Thank you for the opportunity to comment.

Sincerely,



John E. Baldacci  
Governor

cc: Patrick K. McGowan, Commissioner Department of Conservation  
Alec Giffen, Director Maine Forest Service