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Growing better all the time

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March 23, 2006

Rick Fedrizzi, President
U.S. Green Building Council
1015 18th St., NW, Ste 508
Washington, D.C. 20036

Dear Mr. Fedrizzi:

As a professional society of more than 15,000 members, the Society of American Foresters is committed to sustainable forestry and sound conservation. More than 100 years ago we set out to ensure that the United States would have forests for generations to come. We have met that challenge despite an increasingly populations and a tremendous increase in the demand for forest products. In fact, we have about the same amount of forest today as we did one hundred years ago.

We have provided comments during the Leadership in Energy and Environmental Design (LEED) version 2.2 rating system process for new construction. We are deeply disappointed that the current standard does not reflect the environmental benefits of wood products.

The new version ignores our previous comments and the current science regarding sustainable forest products. For example, a recent article in the *Journal of Forest Products* notes that steel in an above grade wall generates 33 percent more greenhouse gas emissions than wood, and concrete generates 80 percent more. The study notes that wood outperforms steel and concrete in terms of energy use and air emissions as well. Wood stores carbon and forests can be regenerated. These are significant advantages over concrete and steel, but the LEED rating system falls far short of recognizing materials with clear environmental benefits.

In addition, by restricting MR Credit 6: Rapidly Renewable Materials to materials harvested within a 10 year cycle, the standard arbitrarily rewards short-rotation intensively managed fiber. Of course, short rotation renewable products have the potential to be environmentally friendly, however, this aspect of the standard does not consider the value of longer rotation forestry that produces significant benefits for wildlife, water quality, and myriad other values associated with forests.

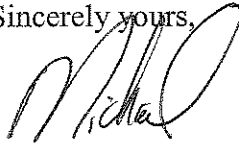


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We are further disappointed with the latest revision of the standard's failure to recognize all of the credible forest certification systems available in North America and worldwide. These programs include the Sustainable Forestry Initiative (SFI), Canadian Standards Association (CSA), the American Tree Farm System and the Programme for the Endorsement of Forest Certification (PEFC), in addition to the Forest Stewardship Council.

I would be happy to discuss our concerns at any time. We appreciate the opportunity to comment on these standards and your commitment to green building. Thank you for your consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Michael", written over a faint, larger signature that is mostly obscured.

Michael T. Goergen, Jr.
Executive Vice-President and CEO