



July 17, 2012

Ms. Caroll Mortensen, Director
California Department of Resources Recycling and Recovery
P.O. Box 4025, MS-25A
Sacramento, CA 95812-4025

Re: Comments on *California's New Goal: 75 % Recycling*

Dear Director Mortensen:

The American Wood Council (AWC) writes to express concerns with the draft report on California's 75 percent recycling goal, which includes a recommendation to use the U.S. Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) rating system. Such exclusive recognition of LEED, a private-sector rating system, would have broader consequences for the wood products industry than CalRecycle has considered in the process of developing this draft report. Development of green building policy should be delegated to the California Building Standards Commission, where staff expertise is best equipped to receive input from industry stakeholders and develop sound policy. **We respectfully oppose the draft report's recommendation to exclusively use LEED.**

AWC is the voice of North American traditional and engineered wood products, representing over 60% of the industry. From a renewable resource that absorbs and sequesters carbon, the wood products industry makes products that are essential to everyday life and employs over one-third of a million men and women in well-paying jobs. AWC's engineers, technologists, scientists, and building code experts develop state-of-the-art engineering data, technology, and standards on structural wood products for use by design professionals, building officials, and wood products manufacturers to assure the safe and efficient design and use of wood structural components. AWC also provides technical, legal, and economic information on wood design, green building, and manufacturing environmental regulations advocating for balanced government policies that sustain the wood products industry.

The forest products industry accounts for approximately 5 percent of total U.S. manufacturing GDP, putting it on par with the automotive and plastics industries. The industry is among the top 10 manufacturing sector employers in 47 states. In California, the wood products industry employs nearly 32,000 individuals at 66 manufacturing facilities, with total annual payroll income of over \$1.3 billion. The estimated state and local taxes paid by the wood products industry totals \$60 million annually.

We support governmental efforts to promote green building. However, the inclusion of a recommendation to use only the LEED green building rating system, to the exclusion of other

consensus-developed rating systems, is of concern. Unfortunately, the system specified in CalRecycle, LEED, does not appropriately recognize the energy saving and environmental benefits of renewable wood products. Through several specific credits, the LEED system puts U.S. wood products at a significant disadvantage to competing (and environmentally inferior) building materials.

One of our primary concerns with the LEED program is its failure to recognize all credible, sustainable forestry certification programs in its certified wood credit. LEED only provides credit to builders using forest products certified by the Forest Stewardship Council (FSC). No credits are awarded for wood products produced by companies independently third-party certified to the Sustainable Forestry Initiative® (SFI) Program standard or the American Tree Farm System® (ATFS) – two of the largest sustainable forest management systems in North America. These two programs alone account for over 100 million acres of forestland in the United States and 3.8 million acres in California, yet are unable to qualify for points under the LEED rating system. This structure forces builders that want to receive LEED credits for certified forest products to largely import their wood from overseas, and exclude products produced in California.

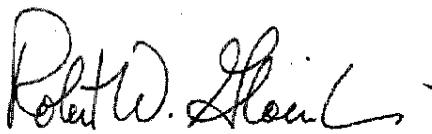
Also, the LEED rating system does not recognize the positive attributes of renewable wood products. For instance, LEED credits builders for using "rapidly renewable materials," which LEED defines as products originating from plants harvested in a 10-year cycle. Lumber produced in California also does not qualify for this credit since domestic timber is grown and harvested on a longer rotation. The credit is designed to benefit exotic crops such as bamboo, wheatgrass, and sunflower seed.

In addition to our concerns about LEED's treatment of wood building materials, we believe it important that California not provide a monopoly in the State's green building business to the U.S. Green Building Council, a private entity and the owner of the LEED standard. We believe California should provide all green building programs the opportunity to compete in the marketplace. Solely referencing the LEED rating system prevents other credible systems, such as California's own Green Building Standards Code (CALGreen) and the Green Building Initiative's Green Globes, from contributing to legislative and regulatory goals.

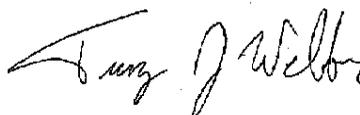
We appreciate the opportunity to present our views regarding high performance building. Wood products can contribute greatly toward building green if addressed appropriately in rating systems. It is, therefore, important that policy promoting green buildings not specify one rating system, but rather make all credible systems eligible to participate in its provisions. Again, we urge you to remove the recommendation to promote the use of LEED from CalRecycle's draft report.

Should you have any questions, please do not hesitate to contact our legislative advocate in Sacramento, Kathryn Lynch, at (916) 443-0202.

Regards,



Robert Glowinski
President
American Wood Council



Terry Webber
Manager, Government Affairs
American Wood Council

**cc: Ms. Teri Wion, Senior Integrated Waste Management Specialist, CalRecycle
Mr. Howard Levenson, Deputy Director, CalRecycle
Mr. Mark Leary, Chief Deputy Director, CalRecycle**