

**AMERICAN FOREST & PAPER ASSOCIATION**

GROWING WITH AMERICA SINCE 1861

September 25, 2007

Mr. David R. Eichenlaub, Assistant Director  
Division of Economics and Finance  
Virginia State Corporation Commission  
P.O. Box 1197  
Richmond, Virginia 23218-1197

Ex Parte: In the matter of determining a CASE NO. PUE-2007-00049 recommended mix of programs, including demand side management (DSM), conservation, energy efficiency, load management, real-time pricing, and consumer education, to be implemented in the Commonwealth to cost-effectively achieve the energy policy goals set in § 67-102 of the Code of Virginia to reduce electric energy consumption

Dear Mr. Eichenlaub,

The American Forest & Paper Association (AF&PA) respectfully requests the State Corporation Commission (SCC) and participants of the Energy Efficiency workgroup consider the forest product industry's concerns regarding any state endorsement of a single green building program to meet its energy needs.

AF&PA is the national trade association of the forest, paper and wood products industry. AF&PA represents companies and related associations that engage in or represent the manufacture of pulp, paper, paperboard, and wood products. The forest products industry accounts for approximately 6 percent of total U.S. manufacturing output, employs more than one million people, and ranks among the top 10 manufacturing employers in 42 states with an annual payroll exceeding \$50 billion. In Virginia, AF&PA members own thousands of acres of forest land and numerous manufacturing facilities while employing over 35,000 individuals.

AF&PA encourages the state to use green building principles to achieve its energy goals. Our industry is very supportive of the green building movement as we believe that wood materials should be well-positioned in the emerging green building marketplace. Wood building materials are energy efficient to manufacture, sequester carbon from the atmosphere and are derived from a renewable resource. Unfortunately, a green building program the state is being asked to consider, the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) system, does not sufficiently recognize these factors.

The forest products industry has serious concerns with the LEED system as it is currently structured. The point system discourages builders from using wood building materials by awarding points to builders for using "rapidly renewable materials." LEED defines "rapidly" as being grown and harvested within a 10 year cycle. Products that meet this standard are invasive species like bamboo, or board made from sunflower

September 25, 2007

Page 2

seed or wheat grass. Since timber stands typically require 15 to 50 years to mature, wood products derived from Virginia are disqualified. We believe that requiring builders to use products derived from materials requiring more frequent harvesting on the land and additional inputs is not an outcome a green building program should promote.

The point system also only recognizes one forest certification program in its certified wood credit. LEED awards a point to products derived from land certified to the Forest Stewardship Council, but does not recognize products certified to the Sustainable Forestry Initiative or the American Tree Farm System, the nation's largest and oldest certification programs, respectively. Under LEED, lumber products derived from any of the over 1,500 certified tree farms (over 700,000 acres) or SFI certified land (over 500,000 acres) in Virginia receive no points under the point structure of this checklist, even though forestry practices on these tree farms is some of the best in the world.

Until the U.S. Green Building Council revises the manner in which it awards points under the LEED program, AF&PA must oppose government efforts to select LEED as the benchmark for green building.

Instead, AF&PA supports competition in the green building marketplace. Government efforts to endorse a single green building rating system only serve to stifle this competition and will ultimately result in fewer green buildings. Alternative green building programs exist and should be given equal consideration under any government policy. One such program is the Green Building Initiative's Green Globes program. This program offers a competitive alternative for architects and builders wishing to pursue energy efficiency and other attributes to building green. Green Globes has been endorsed by many states as equal to LEED and is being adopted by private sector companies intent on constructing high-performance buildings. If you include green building in your recommendations for state energy policy, we urge you to promote competition and not endorse one single green building program at the expense of all others.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "Suzanne Madden", with a long horizontal flourish extending to the right.

Suzanne Madden  
Director, Government Affairs

cc: Randy Bush, Virginia Forest Products Association  
Paul Howe, Virginia Forestry Association