STATE OF MICHIGAN
EXECUTIVE OFFICE
LANSING

RICK SNYDER
GOVERNOR

BRIAN CALLEY
LT. GOVERNOR

May 23, 2012

S. Richard Fedrizzi
President and CEO
U.S. Green Building Council
2101 L Street, NW, Suite 500
Washington, DC 20037

Dear Mr. Fedrizzi:

The State of Michigan strongly supports efforts to improve energy efficiency and has worked successfully with the U.S. Green Building Council (USGBC) in the past. The State of Michigan adopts U.S. Green Building Council (USGBC) LEED standards for all new state construction and major renovation projects exceeding $1 million, and twelve additional jurisdictions within Michigan have some form of LEED requirement. In fact, the city of Grand Rapids is one of the top 50 cities in the U.S. for the number of LEED-certified buildings. Lansing, Michigan boasts the first building to earn Platinum ratings in both the LEED Core and Shell and Commercial Interiors rating systems. Our state is very proud of its growing roster of green buildings.

I am writing today because I hope you will reject two changes to the proposed LEED 2012 rating system that will have unintended negative consequences. Two of the proposed credits, the *Avoidance of Chemicals of Concern* and the *Material Ingredient Reporting*, could detract from the safety, environmental performance and cost effectiveness of future commercial buildings in Michigan and across the nation.

These proposed changes could actually provide a disincentive to use many of the products that enhance energy efficiency. For instance, high performance windows, doors, roofing, insulations, and sealants all contain chemicals on those lists. (Renewable technologies like solar panels do as well.) As I read it, the proposed changes could actually give LEED points for avoiding installation of these materials, even though that would mean avoiding the energy efficiency benefits that would result.

A good example of the potential impact is the use of PVC (polyvinyl chloride) resins. PVC is an excellent insulator. It is also strong and resistant to water and abrasion, and is often used because of its long life and minimal maintenance requirements. Many LEED buildings use these materials to provide key energy-savings benefits. More than 60 companies in Michigan are involved in the business of compounding and processing polyvinyl chloride (PVC) resins, representing 1,150 jobs and $300 million in revenue. Those businesses generate millions in taxes for our state. Arbitrary avoidance of building and construction materials containing PVC and other substances could have a significant impact on Michigan businesses and the people they employ, without a commensurate environmental benefit (and likely a lost environmental opportunity).

These proposed credits will potentially raise construction costs of buildings pursuing LEED certification, or worse, incentivize non-action where efficiency could have been improved. It does this while undermining Michigan-based companies and workers. If the proposed credits are not dropped from LEED 2012, we would be forced to reconsider whether LEED provides the best, science-based approach to enhancing energy efficiency and environmental performance, or whether we should explore other opportunities or certifications instead.

USGBC and Michigan have been strong partners in the past, and I firmly believe we can continue to work together to promote energy efficiency and sustainability in the future. Thank you for your consideration of these concerns as you examine these potential changes.

Sincerely,

Rick Snyder
Governor

cc: Mr. Scot Horst, Senior Vice President LEED
Mr. Brendan Owens, Vice President LEED Technical Development
Mr. Daniel M. Tangherlini, Acting Administrator for U.S. General Services Agency
Dr. David Danielson, Assistant Secretary for Energy Efficiency and Renewable Energy, U.S. Department of Energy
Mr. David Agnew, White House Director of Intergovernmental Affairs
The Honorable Carl Levin, U.S. Senate
The Honorable Debbie Stabenow, U.S. Senate
The Honorable Dan Benishek, U.S. House of Representatives
The Honorable Bill Huizenga, U.S. House of Representatives
The Honorable Justin Amash, U.S. House of Representatives
The Honorable Dave Camp, U.S. House of Representatives
The Honorable Dale Kildee, U.S. House of Representatives
The Honorable Fred Upton, U.S. House of Representatives
The Honorable Tim Walberg, U.S. House of Representatives
The Honorable Mike Rogers, U.S. House of Representatives
The Honorable Gary Peters, U.S. House of Representatives
The Honorable Candice S. Miller, U.S. House of Representatives
The Honorable Thaddeus McCotter, U.S. House of Representatives
The Honorable Sander M. Levin, U.S. House of Representatives
The Honorable Hansen Clarke, U.S. House of Representatives
The Honorable John Conyers, U.S. House of Representatives
The Honorable John Dingell, U.S. House of Representatives