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Forest Owners to EPA: Clarify Policy on Forest Biomass in State Guidance

WASHINGTON, DC, January 22, 2016 – The National Alliance of Forest Owners (NAFO) is urging the U.S. Environmental Protection Agency (EPA) to clarify its policy on forest biomass as set out in the Clean Power Plan (CPP) in its implementation guidance to states. NAFO's comments to EPA are available [here](#).

"EPA states in the preamble to the CPP that biomass is part of the solution in helping states meet their carbon-reduction goals yet provides no useful direction in draft guidance to states on how they can include biomass as a compliance option," said Dave Tenny, NAFO President and CEO. "In fact, EPA excludes biomass from much of the guidance while seeking public comment on unprecedented and potentially complex sustainability and verification requirements that increase uncertainty among states. EPA now must clarify its guidance to the states to avoid confusion and jeopardize the ability of states to fully capture the carbon benefits of biomass energy under the CPP."

"EPA's mixed signals on biomass are out of step with other U.S. and global regulatory authorities, the President's Climate Action Plan and the agency's own rhetoric that consistently distinguish between biogenic and fossil energy sources," Tenny explained. "It should not be difficult for the agency to align its guidance to the states with these positions and recognize the long-standing scientific consensus on the carbon neutrality of biomass."

"History shows that strong markets sustain healthy forests," Tenny said. "As long as our forests are stable or increasing, and capturing more carbon than they release through regular forest management, forest biomass should be considered a carbon neutral option for states in their carbon-reduction energy plans."

The science on the carbon neutrality of forest biomass is clear:

- Scientists and carbon experts at the U.S. Department of Agriculture (USDA) conclude that strong markets improve the long-term carbon benefits of biomass energy.
- The U.S. Department of State also reports, based on EPA and USDA analysis, that strong demand for forest products other than timber will increase forest carbon stocks through ongoing landowner investment.
- One hundred nationally recognized forest scientists sent a letter to EPA on November 6, 2014,



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reaffirming the long-term carbon benefits of forest bioenergy.

- Regularly collected USDA data show that U.S. timberlands are growing at more than twice the rate of harvests. The total volume of trees in U.S. forests has increased 50% in the past 60 years.
- Biomass markets, like other forest products markets, enable private forests to afford forest management that sustains carbon benefits over the long term. EPA data show that carbon storage in U.S. forests offset 13% of total U.S. CO2 emissions annually.

“Biomass is a small but important market for U.S. forest owners. Greater policy certainty will encourage them to invest in their forests and further reduce carbon in the atmosphere while providing a variety of other important benefits to society,” Tenny concluded.

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The National Alliance of Forest Owners (NAFO) is an organization of private forest owners committed to advancing national policies that promote the economic and environmental benefits of privately-owned forests. NAFO membership encompasses more than 80 million acres of private forestland in 47 states. Working forests in the U.S. support 2.4 million jobs. – www.nafoalliance.org

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