



December 18, 2017

Comment Type: Substantive

Section: Definitions

Proposed Revision or Comment: renewable energy: energy that is continuously replenished on the Earth, such as wind, solar thermal, solar electric, geothermal, hydropower, and various forms of biomass.

Reason: Established in 1920, the National Association of State Foresters (NASF) is a non-profit organization composed of the directors of forestry agencies in the states, territories and the District of Columbia of the United States.

State foresters manage and protect state and private forests, which encompass two-thirds of the nation's forests. State forestry agencies in cooperation with federal agencies are the primary delivery system for forestry activities.

NASF views forests as a strategic national resource of vital importance to meeting the nation's economic, environmental, and energy needs. Biomass from the nation's public and private forests can and must be part of any solution to meeting the nation's renewable energy goals, particularly in regions where solar, wind, and other renewable resources are less prevalent

Biomass sources, including biomass from publicly and private owned managed forests sources are considered by states and the Federal government to be renewable energy. Biomass harvested from sustainably managed forests has been recognized as beneficial for greenhouse gas (GHS) by many organizations and governments throughout the world. It is also critical for forest landowners to have markets for their wood fiber to ensure forests can be managed and retained as forests. Green Globes should not restrict the definition of renewable energy as proposed in this draft standard to only recovered waste sources.

Biomass should be broadly defined to include (but not limited to) logging residues, residues from forest or manufacturing operations, byproducts of fuels reduction and forest health and restoration treatments, clean construction debris, urban wood waste, byproducts of land clearing (e.g., for utility right-of-ways, roads) and debris from landscaping firms.

Sincerely,

George Geissler
NASF President
Oklahoma State Forester

Executive Director
Jay Farrell

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