NATIONAL ASSOCIATION OF STATE FORESTERS
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August 8, 2025

Dallas Burkholder
Assessment and Standards Division
Office of Transportation and Air Quality
Environmental Protection Agency,
2000 Traverwood Drive
Ann Arbor, MI 48105

Re: Docket ID No. EPA-HQ-OAR-2024-0505 – *"Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes"*

Dear Mr. Burkholder,

The National Association of State Foresters (NASF) would like to offer these comments in response to Docket ID No. EPA-HQ-OAR-2024-0505 – *"Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes".*

We appreciate the EPA directly soliciting input on how to increase the use of qualifying woody-biomass to produce renewable transportation fuel. This has been a long-standing policy priority for NASF and our members, and one which we have been in consistent frustrating dialogue with EPA for over a decade. It is an example of where we see a strong federal policy nexus with an issue recently identified by all our members as critical to the sustainability of our forests – support for new markets for wood products.[1]

Established in 1920, the National Association of State Foresters is a non-profit organization composed of the directors of forestry agencies in the 50 states, five U.S. territories, three nations in compacts of free association with the U.S., and the District of Columbia. The United States includes 766 million acres of forest, about one-third of the nation's total area. By providing technical and financial assistance to over 10 million private forest owners, and directly managing 76 million acres of state-owned forestland, state foresters follow sustainable forest management principles and best management practices to conserve, protect, and enhance more than two-thirds of America's forests. We are also active collaborators in the management of federally owned forests.

State Foresters are key partners of the United States Forest Service (USFS) and work together on many policy and management initiatives that benefit the forests of our nation. This includes supporting market development through policy tools such as the RFS. NASF was a key stakeholder engaged in the initial passage of the RFS by Congress and in the subsequent EPA rulemaking over ten years ago. We have sent letters to EPA in 2019, 2022 and 2025 on RFS-biomass policy progress, and supported a number of our State Forester members and state-stakeholders in conversations with EPA on this topic. We also provided subject-matter experts to serve on the recent Advisory Panel convened by Strategic Biofuels, producing the EPA-recognized "Practical Guide to Forestry Feedstock under the Renewable Fuel Standard".[2]

Concerns with Lack of EPA Action on RFS Implementation

We have been disappointed that woody biomass has not played the sizable role in RFS implementation that was expected following the passage of the Energy Independence and Security Act of 2007, and as such the RFS has yet to achieve its full potential in supporting healthy forests as was intended by Congress. As with any industry, such as those that would use woody biomass to generate RFS Renewable Identification Numbers (RINs), creating clear and consistent policy that enables and spurs growth is key. However, from what we have observed, EPA has done little to spur growth in forest biomass industries through such RFS policy signals and created confusion among potential industries through inconsistent or nonexistent feedstock eligibility guidance. **We see an opportunity through this current stakeholder engagement for EPA to move forward in establishing RFS biomass policy that is complementary to the agency's public policies on the benefits of biomass.**[3] **Established and emergent biomass industry technologies with ample room for growth stand to benefit from such policies while improving the health of the nation's forest resources.**[4]

We are concerned that a distorted view of forest products market development and the state of our nation's forests is behind this ongoing lack of EPA policy progress. In debates over the well-being of the Nation's forests, it is often the assumption that harvesting trees for wood products represents a threat to their sustainability and to the environmental and social benefits forests provide. However, strong market opportunities are what keep our nation's forests healthy and in forest cover. As evidenced by data from the USDA Forest Inventory and Analysis program and Resources Planning Act Assessment, forest resources in this country are currently stable or increasing, and future economic scenarios with stronger markets lead to more forests on the landscape, not more deforestation.[5]

We see two distinct areas in which EPA RFS policy can be improved to the benefit of the health of our nation's forests. These are further outlined in the four recommendations below, but in brief these are wildfire risk reduction, especially on federal lands, and creating incentives for private forestland owners to keep their lands in forests and not convert to other uses.

A further benefit that can be realized through the below policy recommendations is that rural jobs in forestry, logging, and wood products would be protected and expanded. Domestic timber and lumber production, which the Administration seeks to expand, including off federal lands, must be accompanied by markets for the residual materials generated by the milling process, as well as the small-diameter trees harvested alongside the larger sawtimber-sized trees. With many key forestry production regions severely impacted by closures of pulp and paper mills, new sources of demand for sawmill residues and small-diameter trees must be encouraged to balance the overall wood economy. The nation will not be able to greatly expand production consistent with the purposes outlined in the Administration's Executive Order 14225 - Immediate Expansion of American Timber Production without having outlets for increasing volumes of mill residues and for small-diameter trees; however, the RFS provides a potentially significant policy solution. The *2023 Billion-Ton Report*[6] estimates the potential for turning 34.9 million tons of low-valued small-diameter tree material into renewable energy annually; however, this potential is currently almost completely unrealized thanks in part to a lack of federal policy signals.

Recommendation 1: Expand the EPA Interpretation of Biomass from Areas at Risk of Wildfire to Support Wildfire Risk Reduction, especially on Federal Lands

We appreciate the explicit ask within this comment period for information on "*How to improve implementation of the biomass in areas of risk of wildfire RFS feedstock category*". We see this ask as clear recognition not only of the scope and seriousness of the wildfire problem in this country, but also that EPA sees that the RFS can and should be used as a policy tool to reduce wildfire risk and associated potential damages to communities and infrastructure. Allowing woody biomass, including forest thinnings, from forests in areas at risk of wildfire as eligible feedstock provides solutions to the Administration's call for wildfire risk reduction, improving air quality, strengthening rural economies and contributing to national energy security.

When it passed the RFS, Congress set the definition for this pathway as: *'Biomass obtained from the immediate vicinity of buildings and other areas regularly occupied by people, or of public infrastructure, at risk from wildfire."* [7] However, the EPA subsequently created a much more stringent definition for this pathway ("*Biomass obtained from within 200 feet of buildings and other areas regularly occupied by people, or of public infrastructure, in an area at risk of wildfire")* and has yet to act on the creation of this pathway. Thus, any potential wildfire risk reduction benefits, especially on federal lands, have gone unrealized. The current EPA definition in the regulation is not workable and fails to achieve the Congressional intent of reducing wildfire risk.

The amount of property and infrastructure at risk from wildfire is drastically increasing in this country. This is a function of both the build-out of more structures and infrastructure, but also of

increasing wildfire severity. From 1990 to 2020, the nation's Wildland Urban Interface (WUI) – commonly defined as the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels – exploded by 31% and now covers more than 293,000 square miles or approximately 188 million acres. Within these WUI communities are an estimated 7 million homes having a "major risk" of wildfire damage, meaning one in six American households live in areas identified by the US Forest Service as areas of high wildfire risk.[8] *US Forest Service Wildfire Risk Assessment* maps place 1,100 rural communities at risk of wildfire destruction.[9] This is not solely a western state phenomenon, as nearly half of all Americans who live in areas of high wildfire risk reside in the southern United States.[10] However, risk from wildfire is not simply about whether a structure is in the WUI or not. Millions of acres of federal lands are at high risk of catastrophic wildfires which can impact a wide array of non-WUI infrastructure, including utility corridors, roads, trails, and campgrounds, as well create impacts on individuals, communities and infrastructure far distances from the forest, including through smoke and emissions dispersal.

As such, we believe the current EPA-defined 200' sourcing radius around structures and infrastructure is inadequate to reduce the risk of catastrophic fire to communities. While we recognize the lack of specificity inherent in the legislative term "immediate vicinity", it is our experience that infrastructure can be put at risk by forest fuels many miles away. There are numerous studies showing that large fire growth and resultant damage to infrastructure is often driven by long-range spotting, or firebrands being transported in front of the main fire, sometimes at distances measured in miles, not feet. Utilizing a specific distance fails to account for vegetation, topography, and other characteristics that influence fire behavior and resultant damage to infrastructure and ignores the best available science.[11-22] As opposed to specifying a distance from structures or WUI designation for RFS feedstock eligibility, we would encourage EPA to look at existing information sources (such as the Wildfire Hazard Potential Map created by the USFS[23], the Wildfire Risk to Communities Tool,[24] or state wildfire risk mapping tools such as the Southern Wildfire Risk Assessment Portal (SouthWRAP)[25] in delineating areas within which wildfire risk reduction work as envisioned by Congress in the RFS would be applicable and beneficial. By reducing wildfire risk in priority places across the landscape, the safety of communities and infrastructure from megafires would be increased in the way Congress envisioned.

New rules and definitions for this pathway should expressly include reference to all public and private infrastructure located within and adjacent to forests including, but not limited to, homes and other structures, roads, bridges, powerlines, communication facilities, campgrounds, and trails. It should also recognize that all fiber sourcing on federal lands is, and will continue to be, governed by numerous federal laws and regulations, such as the National Environmental Policy Act (NEPA), Federal Land Policy and Management Act (FLPMA), and Endangered Species Act (ESA) as well as the Forest Management Plan for each management unit, and not create duplicative environmental requirements.

Recommendation 2: Expand and Clarify the Definitions for Slash and Pre-commercial Thinnings to Support Silviculturally Appropriate Management of Non-Federal Forests

While not specifically requested in this comment period, we would like to offer our comment and expertise on the EPA approach to definitions within two private forest feedstock pathways (42 USC 7545 (o)(1)(I)(ii) - *renewable biomass from planted trees and tree residue from a tree plantation located on non-federal land* and 42 USC 7545 (o)(1)(I)(iv) - *Slash and pre-commercial thinnings from non-federal forestland).* The approach is in need of clarification, improvement and expansion to benefit RFS market development, forests and the Americans that own those forests.

Private forest landowners across the country, and in particular in the US Southeast, are at a crossroads. Markets for solid wood products such as lumber and construction materials are strong in many places. However, landowners are increasingly challenged across a large and growing area to have their timber stands commercially thinned and/or cleared of woody material post-harvest. Thinning is a key management tool that lowers stand densities and removes undesirable trees, thus focusing resources such as water, sunlight, and nutrients on the trees that remain, while generating needed intermediate income for the landowner before the stand is ready for final harvest. There are multiple reasons for these difficulties. First, major pulp and paper mill closures have directly impacted states like Florida, Georgia, the Carolinas, and Tennessee. Second, even in places where there has been an increase in lumber production, the corollary increased volumes of mill residues compete with roundwood pulpwood timber harvests for utilization by operating pulp and paper mills.

This lack of markets for slash and thinned low-value material combine to create depressed values for timber stumpage, driving landowners out of active forest management that would otherwise reduce wildfire risk and improve forest health, and potentially out of forest management at all if returns cannot keep up with costs of maintaining the property and paying the property taxes. As today's reforestation decisions will create the resource abundance (or scarcity) we experience 30 years in the future and beyond, it is of great importance that we do not take for granted the abundant timber resources that exist on the lands of private citizens and the ecosystem benefits we as a society derive from those acres being in timber. Of particular importance in the above described scenario, RFS market development would not by-and-large drive new harvesting activity. It would instead create a cost-beneficial market for landowners desperately trying to stay in the business of growing trees who have on their hands biomass with nowhere for it to economically go.

Our understanding of current EPA eligible slash and forest thinnings feedstock eligibility are as follows:

Qualified Biomass Feedstocks

- Slash and pre-commercial thinnings from non-federal land only.
- Slash produced from logging operations in non-federal, RFS land history-compliant managed plantation forests or natural stands
- Stands "thinned from below" to remove trees in the lower crown classes (smaller trees) while favoring retention trees in the upper crown classes (larger trees).
- Stands "thinned from above" to remove trees in the upper crown classes to favor the retention of the best trees (most capable of producing sawtimber products).
- Stands "free thinned", utilizing a combination of all thinning criteria to control stand density and stand composition of desirable trees.
- Underbrush and other vegetative materials from the tract to promote tree growth as part of the qualified thinning activity.

Non-qualified Biomass Feedstocks

- Slash containing whole trees. Although harvesting practices often include cutting whole non-merchantable trees (volunteer trees, crooked trees, etc.), slash piles containing only parts of trees (not whole trees) qualify for the RFS. No tree parts or whole trees can be cut or cleared solely for the purpose of qualifying as slash to meet RFS regulations.
- Thinnings during final harvest. By definition, pre-commercial thinning cannot occur concurrently with a final harvest within the same tract.
- Thinnings to promote growth of future plantings. Qualified thinnings must be for the purpose of concentrating growth on the remaining, existing trees. Therefore, enhancing the growth of trees which have not yet been planted or of seeds to be planted cannot qualify.

State Foresters have three recommendations for expanding these eligibilities, which would all be in line with existing statutory language and congressional intent:

1. Allow all forest biomass from silviculturally-appropriate or wildfire risk reduction treatments to be RFS-eligible feedstocks. There has been confusion regarding whether EPA is only allowing the first thinnings, or only those thinnings taken at a time when no "commercial" material is taken. We ask that EPA immediately create clear guidance on the allowability and timing of thinning activities and incorporate the following two principles into that guidance.

   First, the removal of low-value material at time of harvest for higher-value products can both silviculturally function to support reforestation in desired species, and economically support landowners reforesting as opposed to converting their forests to other uses. This is particularly true in hardwood forests such as those in the Appalachian region, where a significant State Forestry and landowner priority is restoring stands replete with low-

value wood, impacted by historical high-grading practices. Allowing otherwise non-merchantable material, including whole-stem biomass, from stand-restoring or other harvests that generate other products specifically should be allowed under RFS eligibility to support sustainable forestry.

Second, we encourage EPA to refrain from constraining feedstock eligibility using the terms "commercial" and "non-commercial" which confuse the discussion for producers and foresters. The term "pre-commercial thinning" used in RFS legislation is defined by the Society of American Foresters as "the removal of trees not for immediate financial return but to reduce stocking to concentrate growth on the more desirable trees". This definition does not imply a lack of commercialization of the thinned material, simply that the intent behind the management action is silvicultural, not economic. Additionally, by definition, any wood removed for use in an RFS product would become "commercial", so logic constraining feedstocks to "non-commercial" wood become prohibitively circular. Instead, EPA should focus on whether the feedstock comes from silviculturally appropriate thinning or other management, and should consider all biomass from any such treatments eligible.

2. Allow whole trees as part of slash to be an eligible RFS feedstock, or at the very least allow a de minimis level of whole trees in slash (such as no more than 10% by volume). This change would align with the USDA Forest Service definition of slash which includes cull trees, which the EPA itself cited in Federal Register rulemaking (75 Fed. Reg. 14866, March 26, 2010).

3. Allow storm debris that has accumulated as a result of a disaster – such as a wind event, fire, ice storm, or delimbing – to be RFS-eligible. It is our understanding that this policy is currently under consideration by EPA, and we encourage a recognition that landowners with these sources of debris, like other slash and thinnings, need markets for this wood to manage their lands post-disaster.

Recommendation 3 – Broaden Eligibility of Sawmill and Manufacturing Residues Within the RFS to Align with Forest Sector Practices

We appreciate the explicit ask within this comment period for information on "*How to determine and improve eligibility of manufacturing/sawmill residues, especially for facilities that receive a mix of eligible and ineligible RFS-compliant forest feedstock*". We see this as clear recognition of the current policy barrier this part of the regulation represents to the logistical success of RFS-implementation.

The current EPA approach for manufacturing residues is too restrictive and excludes significant amounts of potential feedstock that is otherwise being wasted. According to EPA rules

currently, if any of the forest feedstock going into a manufacturing facility is RFS-ineligible, then none of the residues coming out of the facility are eligible.

To eliminate this barrier, NASF suggests two options that EPA could reasonably use to approach the eligibility of manufacturing residues:

1. Deem all manufacturing residues eligible regardless of the eligibility of the forestry feedstock going into the facility, similar to how EPA envisions treating landfill gas under the RFS. While not all material entering the landfill could be certified as RFS eligible, EPA would allow all the gas generated by that landfill material to be RFS eligible. In doing so, EPA rightfully recognizes the "waste" designation of the input and the lack of any perverse incentive to increased resource use created by an RFS-market. This approach is equally reasonable for forest industry residues, the magnitude of which coming into existence would not be a function of whether an RFS market exists for them or not.

2. Use a mass balance approach or volume credit approach similar to those commonly used in major forest certification schemes in the United States and globally. Under this option, whatever percentage of incoming feedstock that a facility sources on a quarterly, bi-annual or annual basis that is RFS-eligible feedstock is the same percentage of residues that would be RFS-eligible for that time frame for that facility.

Either of these approaches would bolster critical infrastructure across the country that disposes of large volumes of sawmill residues, especially in areas of the country with high wildfire risk, active timber management opportunities, and greatest need for forest restoration.

Recommendation 4 – Allow Generation of Biomass Power to Qualify Under the RFS to Support Additional Markets for Forest Biomass

The EPA should create a pathway for and process RIN registrations from electricity derived from woody biomass that displaces liquid fuels in electric vehicles. This pathway was intended by Congress in its passage of the RFS and acknowledged by EPA in RFS rulemaking; however, to date there has been no progress to operationalize RINs from woody biomass electric power. Using forest biomass for electricity generation has the same forest health and community benefits as the use of biomass for the generation of liquid biofuels (see above for lengthier discussion on these points), and as such would be an equally effective and impactful pathway for the RFS to support forest markets and forest health. Additionally, the biomass power sector has the potential to secure a greater measure of American energy dominance while growing markets for domestically grown wood and wood products. This sector can leverage RFS policy changes immediately, with technologies and facilities currently in operation that can be scaled to the benefit of our nation's forests.

Conclusion

State Foresters see the RFS as an important tool to support forest products markets for biomass, which in turn helps our nation's forests remain healthy and intact while enabling EPA to meet its statutory objectives. We urge EPA to move forward with establishing the necessary policies laid out above to improve the ability of the RFS to support biomass market development and would like to offer the expertise of our staff and state forester members to your agency at any point in this process where you think it would be useful. Additionally, we would like to direct your attention to separate comments from State Forestry Agencies around the country that are being submitted to this request.

Thank you for your attention, and we look forward to continuing to engage with EPA on RFS policy development.

Sincerely,

Patty Cormier
President, National Association of State Foresters
Maine State Forester

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