

National Alliance of Forest Owners  
Comments Submitted To The  
Council for Sustainable Biomass Production  
October 29, 2009

The National Alliance of Forest Owners has reviewed the current draft of the Council for Sustainable Biomass Production Standard and is pleased to offer the comments below.

NAFO is a growing alliance of private forest owners, managers and organizations currently representing 75 million acres of private forests in 47 states. NAFO is dedicated to pursuing legislative and market policies that will enhance the economic and environmental value of privately owned forests across the country.

NAFO recognizes the hard work that has resulted in the current CSBP Standard draft. While our members have concerns over several parts of the Standard, we will focus our comments on the two topics addressed below and will rely on our members to provide additional comments.

NAFO believes that a standard addressing only one product stream from private forests is unnecessary and impractical. In many cases the harvest of biomass will occur concurrently with harvest for other product streams, such as sawlogs or fiber for pulp production. In such cases the biomass component will normally be small relative to the other harvested products and will likely be the least valuable product harvested. Implementing a certification system for the low-value biomass component of a management regime serving multiple potential markets is impractical and will likely be cost-prohibitive for many forest owners. For smaller forest owners conducting a harvest is a once or twice per generation event, and carrying the cost of biomass certification will not be justifiable.

Existing programs used by forest owners address many of the elements of the CSBP Standard. These include state-based Best Management Practices or forest practice regulation, state and federal water quality regulations, management plans written by consulting foresters or state forestry agencies, and in some cases, third party certification under the SFI, American Tree Farm System (ATFS) or FSC Standards. These programs use language familiar to forest owners and have been written by those with a thorough understanding of forest management, as opposed to the CSBP Standard, which attempts to address both agriculture and forestry. We encourage you to carefully consider how existing programs already deliver to forest owners most of the outcomes the CSBP Standard incorporates.

Rather than seeking to advance a single product stream standard for forests, we recommend that CSBP seek mutual recognition with existing, mature and well-accepted forest certification

systems. While exploring mutual recognition we urge that such mutual recognition be based on coarse-scale consistency rather than requirement-by-requirement comparisons. Standards that are generally consistent in their promotion and monitoring of sustainability should enjoy mutual recognition.

Thank you for this opportunity to comment. Please feel free to contact us if you have any questions or would like to discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David P. Tenny", with a stylized flourish at the end.

David P. Tenny  
President and CEO