Forest Service Comments
International Energy Conservation Code

- **The Code should align with Federal and State policies**
- **The Code should be easy to administer**
- **The Code should allow a full range of renewable energy sources**
- **We support the definition of biomass that is in the 2021 IECC Code**

Federal and State Policy

- **Federal Policy - FY 2023 Omnibus Spending Bill language**
  - (1) ensure that Federal policy relating to forest bioenergy— (A) is consistent across all Federal departments and agencies; and (B) recognizes the full benefits of the use of forest biomass for energy, conservation, and responsible forest management; and (2) establish clear and simple policies for the use of forest biomass as an energy solution, including policies that— (A) reflect the carbon neutrality of forest bioenergy and recognize biomass as a renewable energy source, provided the use of forest biomass for energy production does not cause conversion of forests to non-forest use
  - Follows accounting principles provide by International Panel on Climate Change (IPCC)

State Policy

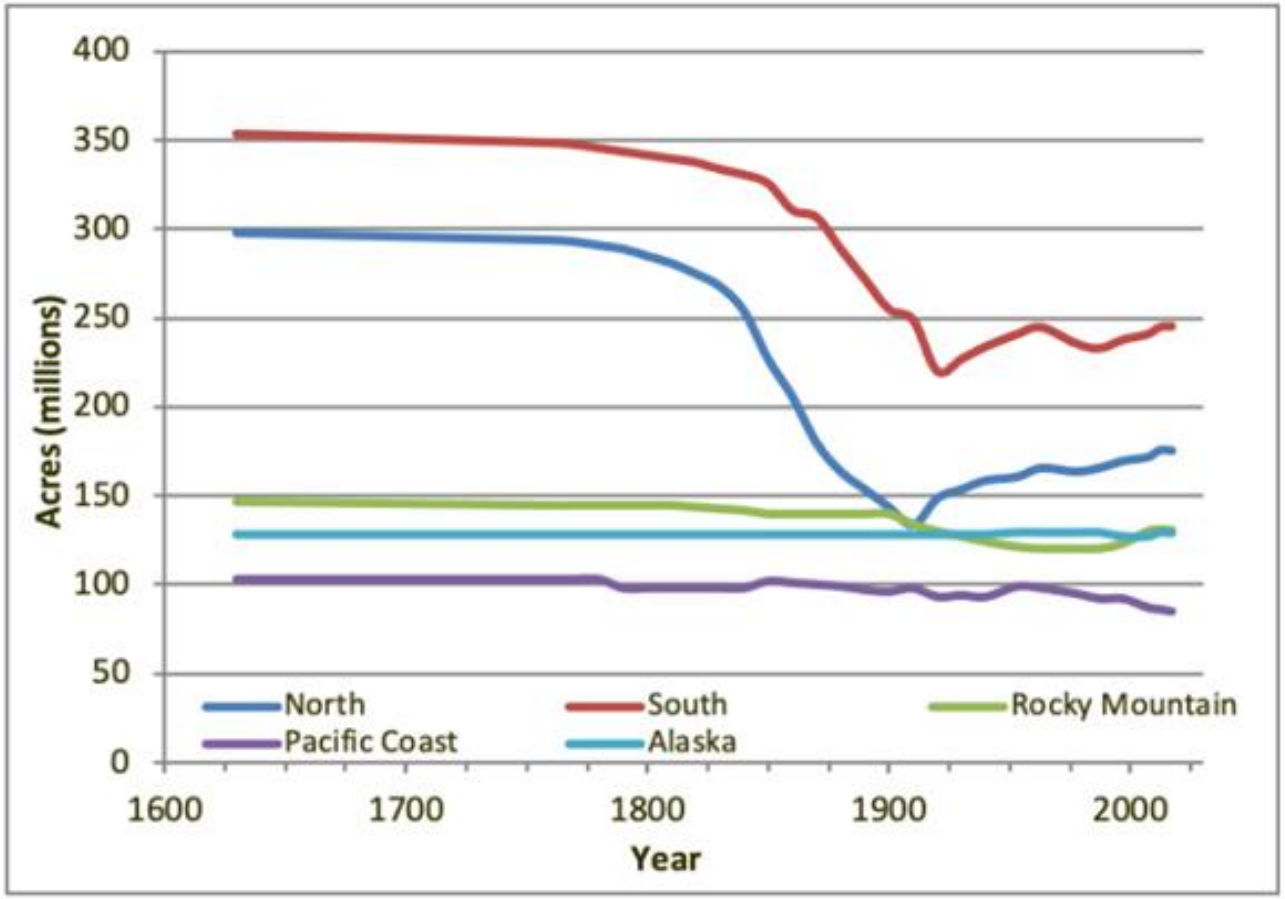
- **Maryland** – In 2022 the Maryland Commission on Climate Change recommended that:
  - The State should develop a new climate-aligned, renewable thermal energy program to facilitate the decarbonization of the building sector.
  - The General Assembly should also modify requirements for woody biomass-to-energy systems to qualify for TRECs. Low-value woody material from a forest management action with a net positive carbon benefit should be included to support healthy and climate-adapted forest composition and sustainable urban tree management.
  - The State should incentivize the development of forest product industries that support sustainable forest management and maximize long-term carbon sequestration.
- **Maine, Massachusetts and New Hampshire** – These states have thermal renewable energy credit programs (TREC's) that include wood as a renewable thermal energy source.
- **RPS Programs** – Twenty-seven (27) of the 30 states with RPS programs include the use of wood energy as a renewable energy source

Forest Sustainability

“Provided use for bioenergy does not cause conversion to non-forest use.”-2023 Omnibus budget language

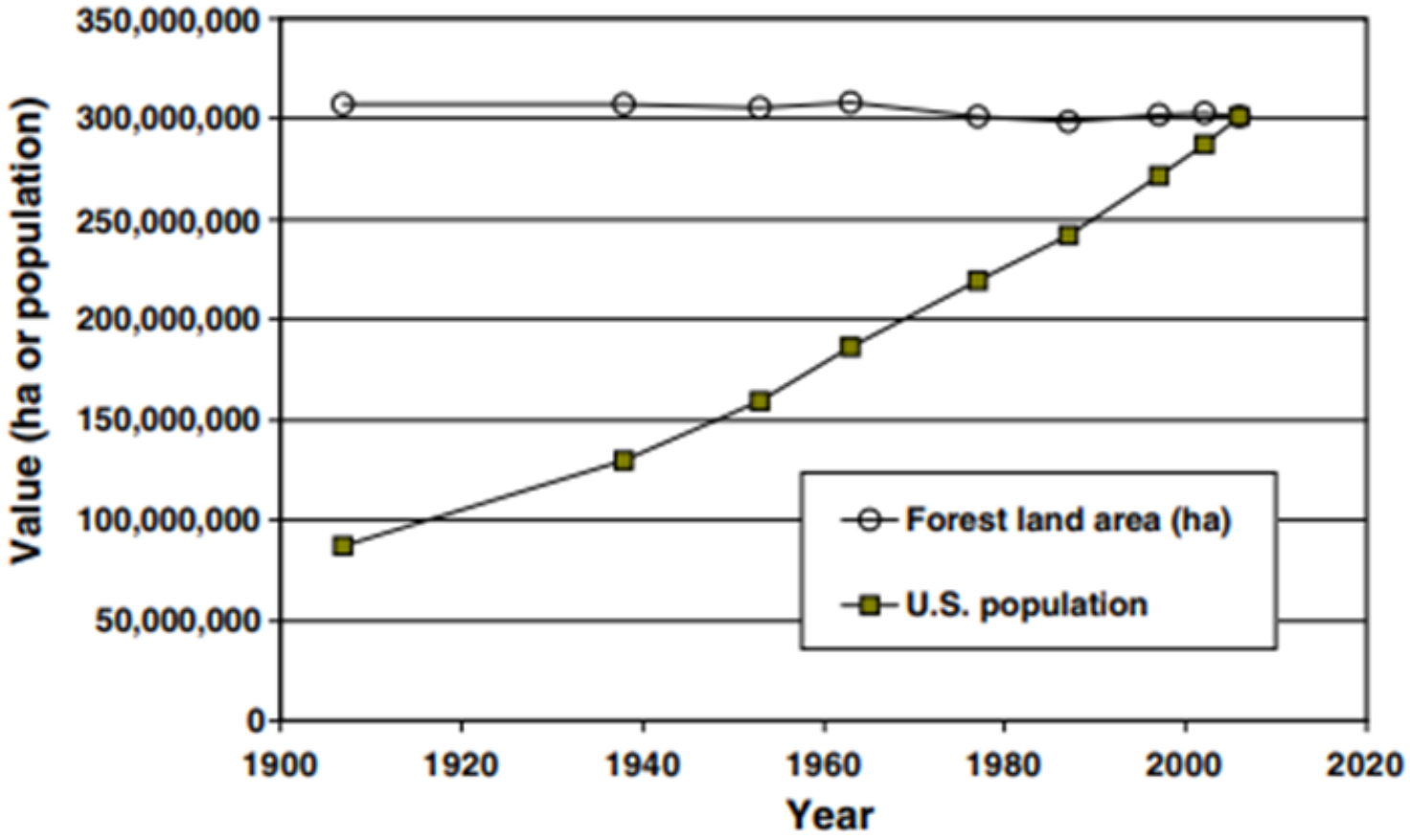
Forest Service FIA Program – Forest inventory since 1930. Budget of $77 million to do annual forest inventory.

FAO 2022 Report – Total forest area in US increased by 18 million acres from 1990-2020



Historical forest area in the United States by geographic region, 1630–2017.

Forest Sustainability and US Population

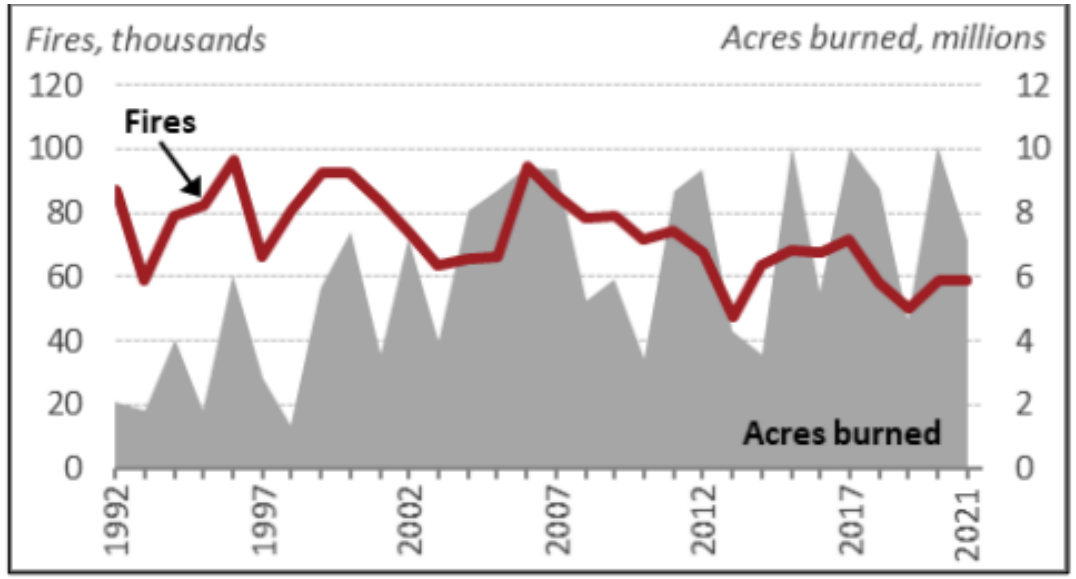


Estimated US forest land area and population, 1907-2017

Forest Health

- Fire is having a major impact on forest health and the benefits provided by healthy forests.
- The scope and severity of wildfire has increased dramatically in the last 15 years.
- An historic drought impacting the western US and increasing mortality caused by native bark beetles in drought stressed trees has increased available fuels.

Forest Health

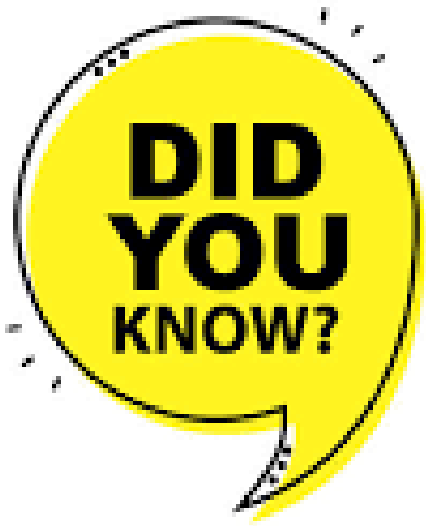


Source: NICC Wildland Fire Summary and Statistics annual reports.
Note: Data reflect wildland fires and acres burned nationwide, including wildland fires on federal and nonfederal lands.

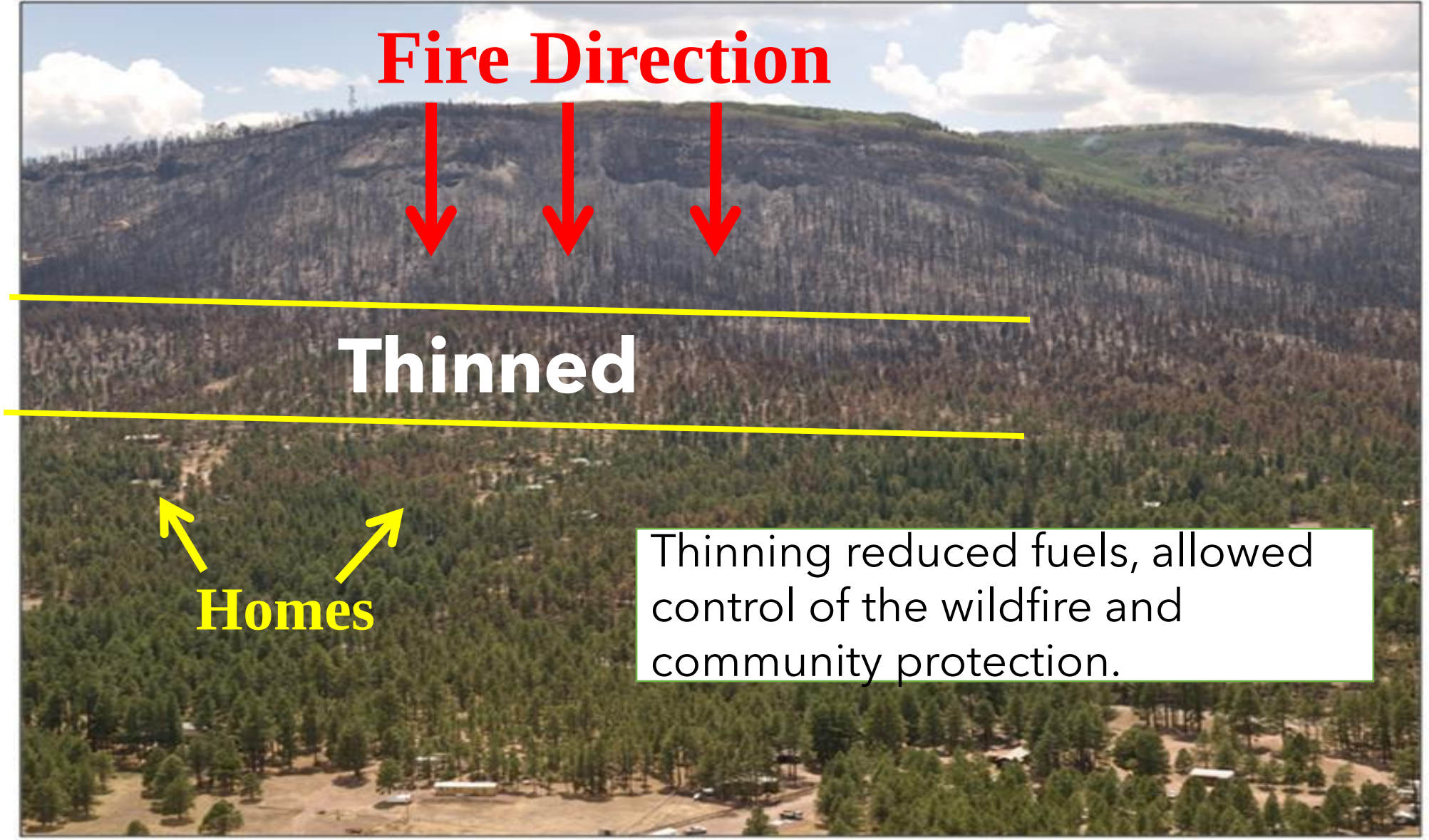
- The number of fires is decreasing;
- The acreage burned is increasing;
- Fires are larger and more severe impacting communities and the ability of the forest to recover.

Moderate, High, or Very High Wildfire Hazard Potential

- 58% of National Forest System lands. **98,900,000 acres!**
- 17% of non-federal lands. **238,310,000 acres!**




We need to avoid this situation by thinning and removing hazardous fuels

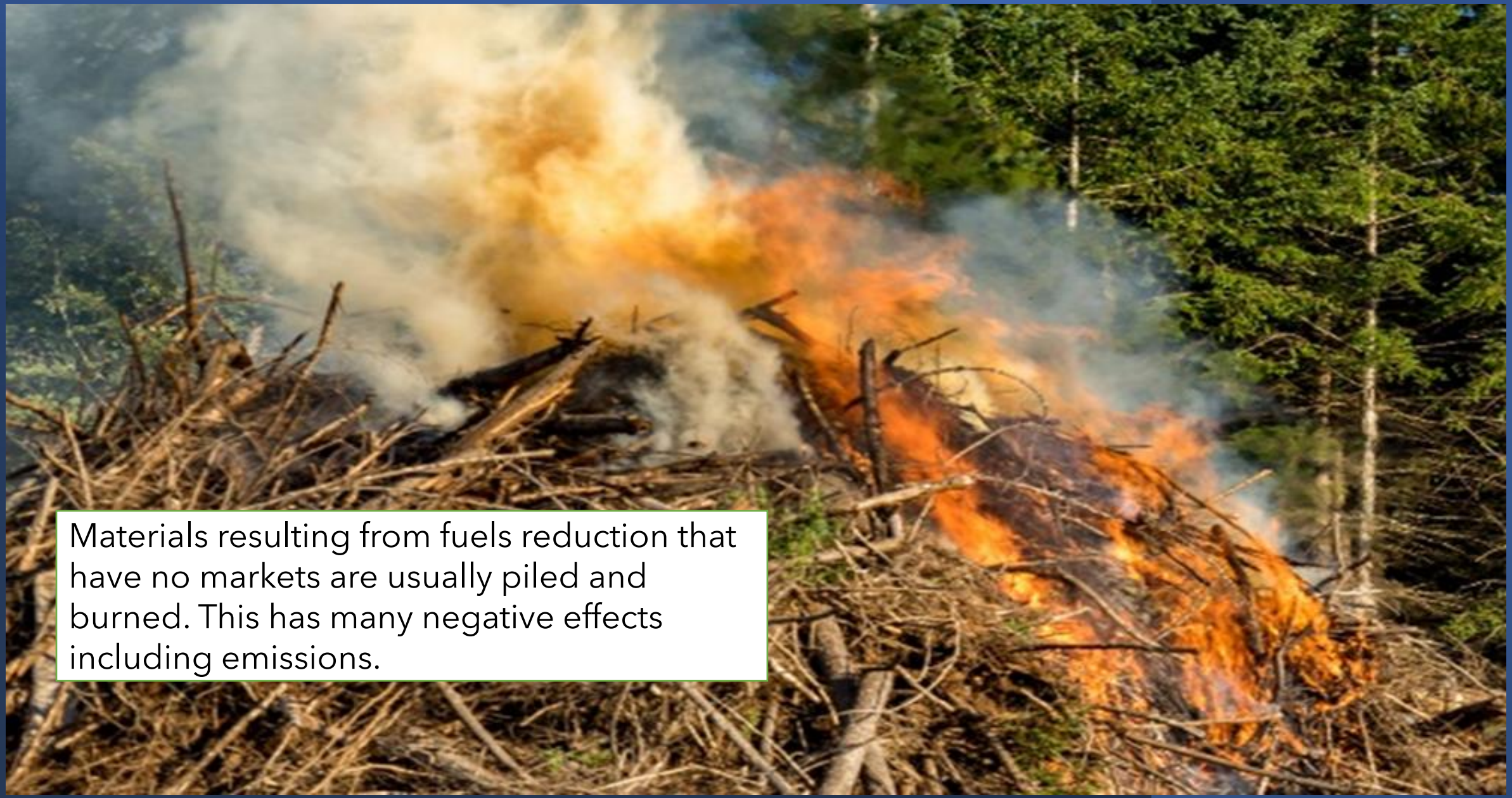


Managing forests with high wildfire risk

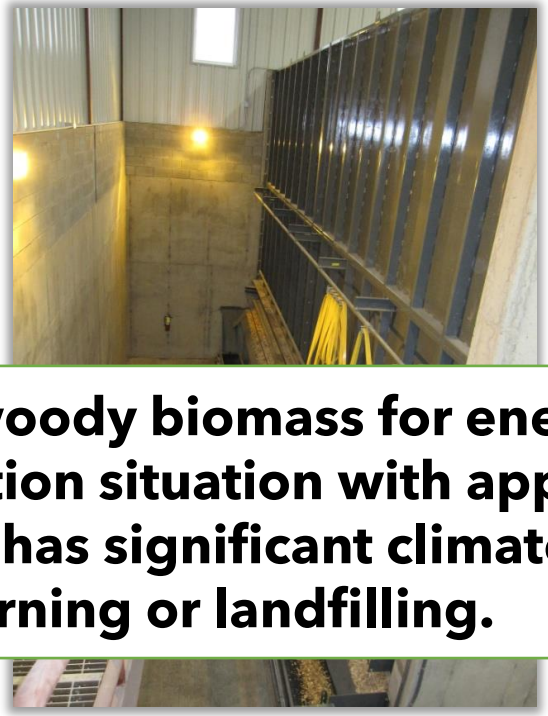
Fuels reduction can create significant unmerchantable material. This material can be used for energy.

Biomass from areas at risk from wildfire

- Federal or non-federal lands -



Materials resulting from fuels reduction that have no markets are usually piled and burned. This has many negative effects including emissions.



Use of woody biomass for energy in a controlled combustion situation with appropriate emissions controls has significant climate benefits over open burning or landfilling.

- $1.7 Million project
- 2.8 mmBtu/hr boiler
- 3,000 gallons thermal storage

Biomass Energy for Commercial Facilities

- **Biomass is a reliable, renewable, sustainable, and low carbon option for heating and cooling;**
- **Biomass is widely used in commercial settings and in district heating systems.**
- **Modern biomass energy systems have low emissions.**
- **Use of biomass in modern energy systems avoids the negative impacts of alternate fates such as open burning and landfilling (methane generation).**
- **We support the definition of biomass that is in the 2021 IECC Code.**