



National Alliance of Forest Owners

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November 6, 2008

The Honorable Susan Dudley  
Administrator  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
1650 Pennsylvania Avenue, NW  
Washington, DC 20503

Dear Administrator Dudley,

On behalf of the members of the National Alliance of Forest Owners (NAFO), I am writing to request a meeting with you to discuss the implementation of the Energy Independence and Security Act's (EISA) changes to the Renewable Fuels Standard (RFS) rulemaking, currently undergoing interagency review. Specifically, we believe it is important that the definition of "renewable biomass" be construed appropriately to enable private forests to make their full contribution within the RFS.

The National Alliance of Forest Owners is a growing national alliance of U.S. private forest owners, managers and organizations dedicated to protecting and enhancing the economic and environmental values of privately owned forests. Officially incorporated in the first quarter of 2008 as a 501(c)(6) not-for-profit organization, our members represent a broad cross section of Americans who are planning for their future by investing in our nation's most renewable natural resource – our forests. NAFO's members own or manage more than 66 million acres of private forests in 47 states.

Congress enacted the EISA to promote the development of renewable fuels from a variety of feedstocks. At the same time, EISA establishes parameters on which land and resources can be used to produce renewable fuel, including trees from privately owned and federal forests. An overly narrow interpretation of these parameters could both limit EPA's ability to meet the standard of 36 billion gallons annually by 2022 and to adequately model the greenhouse gas performance thresholds of wood feedstocks. Therefore, we ask that the definition of renewable biomass be interpreted so as to prevent the unnecessary exclusion of wood biomass that would otherwise be available and that the lifecycle analysis consider both the benefits of the feedstock supply allowed under EISA and the benefits that could accrue if the parameters in the EISA were removed.

Our private forests are well positioned to make a major contribution toward meeting our nation's renewable fuel objectives. We thank you in advance for your consideration of our meeting request and look forward to discussing this issue with you further in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read "David P. Tenny", written over a horizontal line.

David P. Tenny  
President and CEO