HARDWOOD FEDERATION

1101 K Street, NW, Suite 700, Washington, D.C. 20005
Phone: 202-463-2705 • Fax: 202-463-4702
www.hardwoodfederation.com

August 10, 2023

Submitted via www.regulations.gov
Docket No. USDA-2023-0009

Ms. Ms. Mindy Selman
Attn: USDA-2023-0009
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Re: *Federal Strategy to Advance Greenhouse Gas (GHG) Measurement and Monitoring for the Agriculture and Forest Sectors,* 88 Fed. Reg. 44251 (July 12, 2023), Docket No. USDA-2023-0009

Dear Ms. Selman:

Please review the following comments submitted by the Hardwood Federation on the USDA's Request for Information (RFI) on a Federal Strategy to Advance GHG Measurement and Monitoring for the Agriculture and Forest Sectors. By way of background, the Hardwood Federation is the unified voice on federal legislative and regulatory policy in Washington, DC representing 31 local, regional, and national trade associations that serve hardwood businesses and their employees located in every state in the nation.

The U.S. hardwood sector is a fully integrated industry from logging to the manufacture of finished consumer goods which touch every aspect of American life including flooring, cabinets, furniture and moldings in our homes. Packaging, tissue and paper supplies are made of residual chips and dust from hardwood mills. Industrial mats, shipping pallets and railway ties made from low grade hardwood lumber are crucial to America's vast transportation infrastructure. Hardwood processing and manufacturing entities rely primarily on domestic private and public working forestlands for the raw materials that go into their products. As a threshold matter, the hardwood industry supports active forest management and strong domestic and international demand for hardwood products that capture carbon and promote sustainability and rejects policies that will lead to more restrictions on active forest management.

Comments

1. **Active forest management is a demonstrated GHG mitigation strategy which must be incorporated in any USDA GHG measurement and monitoring protocol.**

Working American forests are the source of the wood fiber necessary to bring sustainable goods to market. The contribution of wood products and the outsized role they play in the sequestration and offset of domestic carbon emissions begins with sustainable forest management. Wood from American forests is a key component of the larger carbon cycle. Trees absorb carbon dioxide through the process of photosynthesis to produce the building blocks of trees. The by-product of this process is an essential source of atmospheric oxygen.

Trees store carbon throughout their growing lives. But the carbon benefits don't stop there. Carbon is further sequestered when the trees are utilized to manufacture finished goods. Demand for American grown products composed of wood promotes healthy forests, protects water resources, and supports wildlife diversity, while also producing safe and sustainable products that create economic and employment opportunities for rural, underserved communities. When there is a steady demand for fiber and the resulting wood products, forest sector operations ensure that forests will remain as forests in the future, creating a powerful tool to address climate change.

Per USDA's solicitation of data to be considered to improve GHG measurement and monitoring capability, the agency should note that estimated total forest carbon storage in the U.S., including that stored in finished goods, is 58.7 billion tons.[1] According to EPA's own data, each year forests and harvested forest products capture between 600 and 700 million tons of greenhouse gas (GHG) equivalents, offsetting roughly 12% of U.S. annual GHG emissions.[2] The USDA should also note the long-term trajectory of domestic forest growth and its important role, especially under active forest management, as a significant carbon sink. The U.S. contains 8% of the world's forests, and there are more trees than there were 100 years ago. According to the United Nation's Food and Agriculture Organization, "Forest growth nationally has exceeded harvest since the 1940s. By 1997, forest growth exceeded harvest by 42 percent, and the volume of forest growth was 380 percent greater than it had been in 1920.[3]"

2. **USDA must continue to recognize wildfire mitigation benefits of wood products.**

The Infrastructure, Investment and Jobs Act of 2021 authorized a report on a 10-year strategy to reduce wildfire risk. The USDA's strategy, published in January 2022, highlights the importance of harvested timber and wood products to reduce atmospheric carbon and mitigate wildfires. Specifically, the strategy states that "the wood products industry has been and will remain an important partner for helping achieve [forest] restoration outcomes and reduce wildfire risk." The document further states that "new and innovative uses of wood … can not only support restoration and risk reduction outcomes but also sequester large quantities of

[1] *Integrating forests and wood products in climate change strategies.* UN-FAO Forestry Paper 177, 2016.
[2] *EPA Inventory of US Greenhouse Gas Emissions and Sinks; Chapter 6.* EPA 430-R-20-002
[3] *State of Forestry in the United States of America.* UN-FAO, June 2000. https://www.fao.org/3/x4995e/x4995e.htm

carbon" (See: Wildfire Crisis Strategy Implementation Plan (usda.gov). The hardwood industry recommends that USDA recognize offsets provided by harvested wood products when conducting analysis related to GHG emissions from wildfires.

3. Environmental Product Declarations and other data should inform development of GHG accounting for wood products.

To capture a comprehensive picture of the carbon-capture potential of wood products, the agency should take a holistic view. Per USDA's query within the current RFI related to improvement of "annual GHG estimation of forest carbon, including forest product life-cycle assessment," (See 88 FR 44251 at 44252) the hardwood industry has developed data demonstrating the sustainability of wood as a construction material, for example, through Whole Building Life Cycle Assessment (WBLCA). In November 2022, the Decorative Hardwoods Association and National Wood Flooring Association released two Environmental Product Declarations (EPDs) outlining the "total cradle-to-grave global warming potential" for engineered wood flooring and solid wood floors. By way of background, a wood floor is any flooring product that contains real wood as the top-most, wearable surface of the floor. Wood floors come in many different options. These include, but are not limited to hardwood/softwood, domestic/imported, solid/engineered, jobsite-finished/factory-finished, strip/plank/wide plank/parquet, newly harvested/antique reclaimed/recycled/salvaged, saw cut, grade, specie, length, thickness, profile, and finish type. According to the LCAs and EPDs verified by UL Environment and the American Society for Testing and Materials (ASTM), the cradle to grave (landfilling) total global warming potential for engineered wood flooring is 11.4 kg CO_2e and solid wood floors is 9.2 kg CO2e. According to similar EPDs by the Resilient Floor Covering Institute luxury vinyl plank wood-look flooring global warming potential is nearly six times greater, making hardwood and engineered wood flooring the clear choice for customers in the market for products carrying a reduced carbon footprint.

Also, it is important to compare the sustainable performance characteristics of wood products with alternative materials when developing any federal carbon accounting scheme, whether led by USDA or any other federal agency. Wood products make up 47% of all industrial materials in the U.S. but consume only 4% of the total energy to manufacture those materials. In contrast, manufacturing materials from aluminum, glass, plastic, cement, or brick can require as much as 126 times more energy than making them from wood.[4] In addition, wood products are 50% carbon by weight, continuing to store carbon for the life of the product.[5]

4. The Federal Products Laboratory can fill in "data gaps" to advance GHG accounting programs.

[4] Michigan State University College of Agriculture & Natural Resources. Facing the Facts. https://www.canr.msu.edu/news/facing-the-facts

[5] WoodWorks. Carbon Footprint. https://www.woodworks.org/why-wood/carbon-footprint

Whereas EPD's and other sources serve as existing data to inform USDA's RFI, the hardwood sector and its allies are also looking prospectively to gather the most comprehensive tools possible for accurate and dynamic GHG measurement. The wood products industry is currently advocating for a focused study within the Forest Products Laboratory (FPL) that will accurately quantify the GHG mitigation contributions and potential of wood products, thereby providing a tool for policymakers crafting a federal strategy to advance GHG measurement and monitoring in the forest sector. FPL, in existence since 1910, specializes in researching wood products and their applications, and is therefore well suited to take on a project of this kind. The study would task FPL to examine on a very granular level, broken down by discrete components of the larger wood products sector, the amount of carbon stored annually in wood products. This data compilation would create a baseline upon which annual updates could be made. Annual increases in the amount of carbon stored in wood products could then be measured, and their ability to mitigate a changing climate, quantified.

To that end, the hardwood industry and its allies have successfully advocated for report language attached to the Senate Fiscal Year (FY) 2024 Interior and Environment Appropriations bill, directing FPL to undertake such a study:

> ***Forest Products Laboratory*.** —The Committee expects the Lab to continue research to advance wood markets, including research on the amount of carbon stored annually in wood products, evaluated by specific wood producing sectors, setting the stage for the completion of this carbon storage accounting on an annual basis. Efforts will also continue to focus on the environmental lifecycle benefits of wood products in the built environment, utilizing a ''whole building'' life cycle approach to quantify these benefits. (Senate Report Number 118-83; printed July 27, 2023; pages 108- 109).

Conclusion

The Hardwood Federation appreciates the opportunity to submit these comments, as well as your careful consideration of them. In addition to the comments outlined above, the Hardwood Federation supports comments submitted by the American Wood Council, National Alliance of Forest Owners, Society of American Foresters and the U.S. Endowment for Forestry and Communities on technical aspects of the current RFI.

Sincerely,

Dana Lee Cole, Executive Director
Hardwood Federation