



National Alliance of Forest Owners  
*Investing in the Future of America's Forests*

April 29, 2010

Richard Clayton  
Office of Industry Employment Statistics  
Bureau of Labor Statistics  
United States Department of Labor  
Room 4840  
2 Massachusetts Avenue, NE  
Washington, DC 20212  
Submitted via e-mail to [green@bls.gov](mailto:green@bls.gov)

**Notice of Solicitation of Comments on Green Jobs (75 *Federal Register* 12571 (March 16, 2010))**

Dear Mr. Clayton:

The National Alliance of Forest Owners (NAFO) welcomes this opportunity to submit the following comments in response to the Bureau of Labor Statistics (BLS) request for comments on the definition the BLS will use in measuring green jobs, the industry list, and anything else that should be considered in measuring green jobs. The notice was published in the 75 *Federal Register* 12571 (March 16, 2010).

NAFO's mission is to protect and enhance the economic and environmental values of private forests through targeted policy advocacy at the national level. At the time of this submission, NAFO's members represent 75 million acres of domestic, private forests in 47 states. NAFO was incorporated in March 2008 and has been working aggressively since to sustain the ecological, economic, and social values of forests and to assure an abundance of healthy and productive forest resources for present and future generations.

**Summary**

Private working forests are sustainable, renewable, and provide numerous "green" public benefits, such as low carbon building materials, recyclable consumer products, renewable low carbon biomass energy, greenhouse gas mitigation, and an abundance of clean air and water, wildlife habitat and recreational opportunities for millions of Americans. Owning and managing private forests to produce these public benefits is one of the original green industries. Thus, the jobs that support sustainable forest management and forest product manufacturing should be recognized as green jobs.

**I. Private forests are a sustainable and renewable natural resource.**

Private working forests are a fundamental part of the basic infrastructure of our nation, producing renewable, recyclable and reusable wood and paper products society wants

and needs, absorbing and storing carbon, producing clean water and air, sustaining plants and wildlife, providing quality recreation experiences, and supplying a growing source of renewable energy. Because of the markets for forest products, over the past 100 years forest acreage in the United States has remained relatively stable, and over the past 50 years total growing stock has risen 49 percent. The United States consistently grows more timber than it harvests.

Private forestry operations are also managed to an ecologically sustainable manner. Forestry is governed by a comprehensive set of laws, regulations, and non-regulatory policies at the federal, state and local level in addition to voluntary, third-party certifications<sup>1</sup> of sustainable forest practices. The resulting framework has developed over many years and is now mature and adapted to resource conditions and needs of individual jurisdictions. The effectiveness of this framework has made the United States a world leader in sustainable forest practices. We can expect this leadership to continue as we utilize our forest resources for forest products and other public benefits through forest industry jobs – jobs that help conserve forests, our renewable natural resource.

## **II. Private working forests and forest products can help mitigate climate change and fuel domestic, renewable energy.**

Private forests and forest products are a fundamental part of the solution to two of the most pressing issues of our time: the need to address climate change and produce clean, renewable sources of energy.

According to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change released in 2007:

*“In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fiber, or energy from the forest, will generate the largest sustained mitigation benefit.”<sup>2</sup>*

Private working forests and the forest products they produce help mitigate climate change by:

- Storing carbon in sustainably managed forests;
- Storing carbon in long-lived forest products;
- Providing customers with forest products they can substitute for more energy-intensive products, such as concrete and steel in buildings; and
- Providing cellulose-based fuels as a substitute for fossil fuels to generate electricity, in thermal applications, and to power vehicles.

---

<sup>1</sup> [Environmental Regulation of Private Forests](#), National Alliance of Forest Owners. 2009.

<sup>2</sup> Climate Change 2007: Mitigation. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [B. Metz, O.R. Davidson, P.R. Bosch, R. Dave, L.A. Meyer (eds)], Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, page 543.

Private, working forests also play a substantial role in helping the United States achieve energy independence while reducing greenhouse gas (GHG) emissions through renewable forest biomass energy because it does not increase carbon in the atmosphere when used on a sustainable basis.<sup>3</sup> Forest biomass is a renewable energy feedstock that can help meet our national renewable energy goals in all regions of the country, if placed on a level playing field with other renewable energy sources, and will account for as much as one-third of the renewable energy contemplated in various policies pending before Congress. As cellulosic ethanol from woody biomass develops into a commercially-viable technology, the contributions of domestic forests to American energy independence will become even more significant.

### **III. Private forests provide numerous environmental benefits, and forest product markets ensure the benefits will continue.**

In addition to a stable supply of forest products, private, working forests provide open space, wildlife habitat, clean air and water, recreation, energy, and strengthen rural economies, just to name a few of the public benefits.<sup>4</sup> Forest owners frequently provide these benefits without remuneration from the public, requiring them to internalize any associated costs.

The U.S. has experienced sustained growth in its forest resources in concert with an ever-increasing demand for renewable forest products. This is attributable at its core to the fact that viable markets for forest products keep forestland economic compared to other uses spurring investment in forest management and limiting forest conversion to other land uses that realize a greater economic return.<sup>5</sup> Without these markets, forest land would convert to other uses, and the public would lose the public benefits private forests provide.

### **V. Specific recommendations on the proposed definition and industry list.**

NAFO agrees with the Bureau of Labor Statistics (BLS) that “agricultural and natural resources conservation” should be one of the categories of green jobs. The notice states that this includes, “Research on and development and implementation of technologies and practices to reduce the environmental impact of agricultural production and improve natural resources conservation, including reducing use of chemical fertilizers and pesticides, soil and water conservation, sustainable forestry, land management, and wildlife conservation.” How “natural resources conservation” is further defined and applied is critical.

As documented earlier in these comments, private, working forests provide numerous public benefits that are universally accepted as “green,” including wildlife habitat, renewable resources, clean air and water, open space, climate change mitigation, and

---

<sup>3</sup> U. S. Environmental Protection Agency Combined Heat and Power Partnership. Biomass Combined Heat and Power Catalog of Technologies, 96 (Sept. 2007) available at [www.epa.gov/chp/documents/biomass\\_chp\\_catalog.pdf](http://www.epa.gov/chp/documents/biomass_chp_catalog.pdf).

<sup>4</sup> [State of America's Forests](#). Society of American Foresters. 2007.

<sup>5</sup> [Ecological Implications of Biomass Policies for Private Forests in the United States](#). Dr. Al Lucier. National Council for Air and Stream Improvement. April 2010.

more. These are all provided in a sustainable manner. Private forest landowners verify their adherence to sustainable forest management principles in many ways, including compliance with state and federal laws and BMPs; cooperative agreements with government agencies, conservation organizations, and multi-stakeholder partnerships; transparent data collection and reporting and adherence to forest certification systems is an especially important method.

Including all jobs that sustain forests as forests, from forest management to manufacturing forest products into wood for homes, furniture and recyclable consumer goods, is appropriate. These jobs meet the test of natural resources conservation by returning value to forest owners enabling them to invest in long-term forest conservation as opposed to using forest lands for other more economically competitive uses that provide fewer public environmental benefits.

Specifically, NAFO has comments on the following NAICS codes:

**113210, 113310, and 115310 (Forest nursery and gathering forest products; Logging; Support activities for forestry)** – These are appropriately included as green jobs, but the industries should not be limited to reforestation and biomass feedstock as implied in the examples of green goods or services. Forestry and the professions that support it are green jobs because they contribute to renewable and sustainable forest practices in the United States that conserve forests as forests as an alternative to other economically competitive land uses.

**113110 (Timber tract operations)** – Timber tract operations are not listed as green jobs, but Forest nursery and gathering forest products (113210), Logging (113310), and Support activities for forestry (115310) are all listed. Timber tract operations are integral to these activities and should also be included.

**221119 (Other electric power generation)** – Jobs associated with biomass as a renewable, domestic, carbon-beneficial power source are appropriately included as green jobs.

**Forest product manufacturing** – There are numerous categories for forest product manufacturing, from saw and pulp mills to sanitary paper product manufacturing. Because forest products are renewable and sustainable, the jobs in these industries should be considered green jobs. As noted earlier, the markets for these products are the most effective conservation method to keep private, working forests as forests.

America's private forest owners and the products they produce are green. In fact, private forest management and the associated forest products have been green jobs long before the term was coined, so they should be included in any compilation of green jobs by the BLS.

Thank you for your time and consideration of NAFO's comments. Please let me know if you have additional questions or need additional information. I can be reached at (202) 367-1251 or [dttenny@nafoalliance.org](mailto:dtenny@nafoalliance.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Tenny', with a long horizontal flourish extending to the right.

David P. Tenny  
President and CEO