



VIRGINIA LOGGERS ASSOCIATION, INC.

"Voice for Virginia's Professional Loggers"

March 14, 2018

Karen G. Sabasteanski
Department of Environmental Quality
1111 East Main Street, Suite 1400
Richmond, VA 23218

Reference: Regulation for Emissions Trading [9VAC5 – 140]

Dear Ms. Sabasteanski:

This submission is made on behalf of the Virginia Loggers Association, a non-profit organization, and is directed at the proposed amendments regarding CO2 Budget Trading Program, Part VII of 9VAC5-140 (Regulations for Emissions Trading).

The Virginia Loggers Association (VLA) requests the Department of Environmental Quality (DEQ) to treat biomass as a carbon neutral natural resource beneficial to human society. Furthermore, we ask DEQ to treat biomass used as a sole or partial source of input energy in their electric production as a carbon neutral resource. We also ask DEQ to maintain the current exemption for industrial boilers.

Members of the VLA consist of many logging businesses which harvest and haul forest products from the forests to various mills in Virginia and beyond. VLA also represents mills and other businesses which serve both logging and mills.

Our members place their faith in the science which shows that biomass is carbon neutral. We are grateful to work with a naturally renewable resource that requires only the natural resources provided by God to grow and harvest. Trees

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need no special assistance from man to grow as they amazingly regenerate from seed and sprouts to reforest our lands.

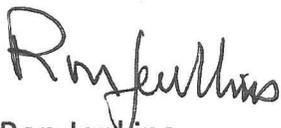
Virginia has very favorable conditions for forestry. Most of its forests are privately owned yet available to society for their beauty and environmental benefits. Our government and policy makers have partnered with the corporate world to make reforestation a priority. Today our forest products industry ranks as Virginia's third largest contributor to our economy and provides nearly 9 Billion Dollars in environmental benefits i.e. cleaner water and air, recreational activities and more.

Biomass has become an important component of Virginia's energy policy. Many of our members invested millions of dollars in their equipment to provide biomass to utilities across Virginia and participate in the energy market. We ask that any future regulation recognize the investments made by our mills and logging businesses as well as the renewable natural qualities of forests.

Some areas of the proposed amendments would require our mills to invest further for monitoring biomass sources currently not required by regulations. We ask that you reconsider and remove any additional requirements on biomass based input sources. Continue to treat our biomass as carbon neutral and do not require additional efforts. Finally, we ask that DEQ maintain the current exemption of industrial boilers.

We are fortunate to have a system which values our opinions. Thank you for the opportunity.

Sincerely,

A handwritten signature in black ink that reads "Ron Jenkins". The signature is written in a cursive, slightly slanted style.

Ron Jenkins
Executive Director