



New York Climate Action Council
Draft Scoping Plan Comment
NYSERDA
17 Columbia Circle
Albany NY 12203-6399

Re: Regulation of wood burning heating equipment

There are indications that the NY Climate Action Council may be seeking a ban on the burning of firewood and the use of wood burning stoves and furnaces in New York State. While there are only indications of a contemplated ban at this time, the New York Forest Owners Association (NYFOA) is very concerned if this is the direction our state is headed. Our forests produce significant quantities of wood that is used in an array of products, including wood as a viable fuel. Very often the wood used for fuel is the waste wood which is removed to improve the overall ability of an otherwise healthy forest to sequester carbon. This so called waste wood becomes a useful by-product in the form of firewood and biofuel offering NYS residents a dependable, reasonably priced fuel resource. It is NYFOA's mission to promote sustainable forest management and stewardship, and the harvest of firewood and other low-grade timber is an important management tool for forest owners. Wood is a renewable resource that can be sustainably managed to meet wood product and energy needs.

Wood heating devices, if properly installed and meeting all DEC regulations, represent an efficient, affordable, and environmentally friendly way to heat homes here in New York State. Currently, there are no specific bills before the legislature seeking a ban on the burning of firewood and the use of wood burning stoves -- although bills have been introduced in previous sessions to regulate certain types of outdoor wood burning furnaces.

The New York Forest Owners Association is in favor of seeing that the most up-to-date design of wood burning equipment is used for home heating. Most modern equipment already contains heat recovery and after-gas burning chambers. As a result, almost no particulate matter and very little CO₂ is emitted into the atmosphere. The New York Department of Environmental Conservation (DEC) already lists acceptable devices (see the NYSDEC website). Considering life cycle emissions, these devices are less polluting than many alternative forms of home heating. Furthermore, in rural New York where electric power reliability is not certain, wood burning stoves are a necessity.

We applaud the work of the Climate Action Council and its Advisory Panels and Working Groups for their work on important environmental issues. Our organization will be submitting more detailed comments but wish to draw this important issue to your attention. Please feel free to contact us with any questions or to learn more about our organization.

Yours truly,

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