



January 2, 2024

Director, Lands, Minerals, and Geology Management Staff
201 14th Street SW, Washington, DC 20250-1124
RE: Comment reference RIN 0596-AD55
Submitted via <https://www.regulations.gov>

Dear Madams and Sirs:

The [Carbon Business Council](#) (CO2BC) is a nonprofit trade association of more than 100 innovative carbon management companies with over \$16.5 billion in combined assets working across six continents. We appreciate this opportunity to provide input on [the proposed changes to 36 CFR Part 251](#) to enable subsurface carbon storage on National Forest System (NFS) lands.

We respectfully submit two comments for your consideration:

- As a general point, CO2BC and our membership strongly support this rule change. Carbon storage on the 193 million acres of NFS land represents a significant incremental climate mitigation opportunity, as well as a material revenue opportunity for the U.S. Forest Service that can be used to fund wildfire management and other essential initiatives. It is critical to note that the rule change merely allows the possibility of carbon storage on NFS lands – it does not exempt potential projects from any permitting or regulatory requirements for these projects – which is entirely appropriate.
- We strongly encourage the proposed change to § 251.51 to be expanded to accommodate additional types of subsurface carbon storage, not only carbon dioxide. These include [direct sequestration of biomass](#), [bio-oil](#), and [torrefied biomass](#).^{1, 2, 3} Again, all projects should be subject to any and all permitting and regulatory requirements, but enabling more method-neutral carbon storage will maximize the climate impact of this policy.

We would be pleased to discuss this further with you if additional information or clarification would be helpful. We appreciate the opportunity to submit this input for your consideration.

Sincerely,

Benjamin Rubin

Ben Rubin
Executive Director, Carbon Business Council

Isabella Corpora

Isabella Corpora
Associate Director, Carbon Business Council

¹ Zeng and Hausmann. [Carbon Balance and Management](#), April 2022.

² Jubbawy. "[New Protocol for Bio-oil Geologic Storage](#)." Isometric, December 2023.

³ Soeherman et. al. [ACS Engineering Au](#), January 2023.