

May 19, 2009

The Honorable Henry Waxman  
Chairman  
House Energy & Commerce Committee

The Honorable Joe Barton  
Ranking Member  
House Energy & Commerce Committee

Dear Chairman Waxman and Ranking Member Joe Barton:

The Society of American Foresters (SAF), the national scientific and educational organization representing the forestry profession in the United States with over 14,000 members urges the Committee on Energy and Commerce to revise its biomass definition throughout the American Clean Energy and Security Act. As an organization chartered to advance the science, education, technology, and practice of forestry for the benefit of society, the SAF believes that woody biomass energy from our nation's forests is part of the solution and the largest available feedstock to supply America with reliable renewable energy.

It is distressing that at a time when considerable efforts are being made to address global climate change—by preventing the conversion of forests to competing uses and by mitigating the likelihood of increasingly devastating wildfires—the definition of “biomass” in a federal RES could needlessly limit the management options available to federal land managers, and diminish the market incentives available to private forest landowners that allow them to resist development pressures and maintain their land as forest. A biomass definition should be scientifically, socially, and ecologically appropriate definition, which can help balance the nation's most pressing forest management needs and safeguard the important environmental and societal values our forestlands provide.

Though the Committee has made several positive changes to the biomass definition, significant changes need to be made to promote the development of economically and environmentally viable forest biomass energy production together with those that assist communities, forest owners, public forest managers, and local entrepreneurs in accomplishing urgent wildfire prevention and forest health improvements.

Specifically, SAF has the following comments on certain components of the definition:

- 1) The exclusion of ‘mature stands’ on federal lands is extremely problematic. The federal lands definition first encourages the removal of biomass to treat areas infested with insect and disease or to remove hazardous fuels (to prevent catastrophic wildfire). Yet, the very forest stands that would need these treatments are mostly mature stands. Further, a vast majority of federal forests are ‘mature’ according to the application of the term in forestry. Excluding these lands has no basis in science.

- 2) The exclusion of ‘old growth stands’ on federal lands is also problematic. Though protecting old growth forests is a laudable goal, many old growth forests need management to improve the health of individual trees contributing to old growth structure. The largest threat to old growth on federal lands is actually insect and disease infestation. By removing smaller trees and brush, larger trees will no longer have to compete for water and nutrients making them healthier and more resilient to climate change, fire and insects/disease. Though counter-intuitive for many, appropriate management should be encouraged to protect and prolong the life of these forests.
- 3) The exclusion of inventoried roadless areas, components of the National Landscape Conservation System and other designations, ignores the specific purpose for each of these areas and the corresponding management plans. Management plans take several years to write, have significant public involvement and include the best available science with the landscape’s needs to achieve desired future conditions of the area. Further, a project removing biomass from any of these areas would have to comply with the management plan and meet the rigorous environmental review required in the National Environmental Policy Act (NEPA).
- 4) The exclusion of ‘High Conservation Priority Forest’ may have unintended consequences. Again, though counter-intuitive, many of these forests may need management to maintain or enhance existing values, such as wildlife habitat. Further, the extra revenue stream to landowners from a biomass harvest could encourage much-needed forest management that may not have been affordable prior to an RES market. Finally, completely excluding these areas from participating in a biomass market could influence a landowner’s decision to keep land forested or sell it for development (for example).

The SAF thanks the Committee for the positive changes it has made, but asks that you address these four problems to ensure the best possible definition to help meet the goals of the RES. We stand ready to assist the Committee with crafting this definition.

Sincerely,



Michael T. Goergen  
Executive Vice President & CEO