

FEBRUARY 17, 2009

SOCIETY OF AMERICAN FORESTERS

TESTIMONY

SENATE NATURAL RESOURCES AND ENERGY COMMITTEE

HEARING

ON THE

RENEWABLE ELECTRICITY STANDARD

On behalf of the Society of American Foresters (SAF), which represents every segment of forestry in the United States with more than 14,000 members, please accept the following testimony for the Hearing Record on the Renewable Electricity Standard (RES) held February 10, 2009.

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 to supplying America with reliable renewable energy. As the Senate is aware, 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. We commend the Senate's efforts to craft a more 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.

SAF supports strategies and policies that 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 improvement projects. This includes appropriately defining “woody biomass” in any federal legislation.

Increased utilization of forest biomass will also help combat global climate change and improve the nation's energy security by providing an abundant, renewable fuel resource as a

substitute for imported fossil fuels in both public utility and industrial power generation facilities. On public lands in the West, many of the silvicultural treatments prescribed to reduce the risk of catastrophic wildfire and improve forest health will generate large volumes of forest biomass. Increased utilization of forest biomass can improve forest conditions in the eastern and southern states as well, where additional markets for low-quality and small-diameter trees also will enable forest managers to improve forest health. On other forests, both public and private across the country, forest health and restoration treatments are needed to control insects and disease and to improve wildlife habitat and watersheds. This type of management can be costly, as much of the biomass removed currently has little to no value. An RES, structured appropriately, would help to create a market for woody biomass. This, in turn, could encourage much-needed forest health or fuels reduction projects by offsetting some of the cost of biomass removal. An RES with a restrictive, one-size-fits-all definition would encourage the opposite.

Lately, there has been much discussion of the sustainability of biomass power generation under a federal RES. There are two potential approaches to addressing sustainability. An outcome based approach would allow a broad definition and the flexibility to manage forestland sustainably. Ideally, on private land, this would be done with the assistance of a professional forester who writes a management plan that addresses soil conservation, water quality, wildlife habitat, and biodiversity. This approach would allow management decisions to be site specific and unique to the forest stand being managed. It also would serve as a powerful incentive for landowners to consult with professional foresters to promote best management principles, and to allow management efforts to adapt to changes in the landscape or as new science and management techniques become available (i.e., adapting climate change or other disturbances).

The second approach is prescriptive and process-based, and would include a one-size-fits-all definition that precludes certain biomass through diameter limits or other prescriptive requirements. Although this method may give some interested parties a level of comfort, it is a disservice to our nation's forests and has no basis in science. Forests are complex, diverse, and in constant flux as a result of natural and man-made disturbances. No two acres are alike and, as such, no two acres should be treated alike. Thus, a prescriptive definition could serve as a disincentive to restore forest health in many areas, because federal requirements would be too onerous and may even contradict necessary silvicultural treatments. The 2007 Energy Bill's Renewable Fuels Definition of "renewable biomass" is a good example of this problem.

In regard to public lands, the SAF believes current laws and regulations, such as the National Environmental Policy Act (NEPA), National Forest Management Act (NFMA), and the Federal Land Policy and Management Act (FLPMA), provide more than adequate requirements for the sustainability of biomass removal. Past biomass definitions have excluded areas such as Wilderness, Wilderness Study Areas, and inventoried Roadless areas. Although this is politically understandable, from a forestry perspective it makes little sense. Some of these areas are in need of habitat restoration, insects and disease containment, or fuels reduction projects, which could maintain the character of these special designations while simultaneously improving forest health. Land managers in the Forest Service and Bureau of Land Management should decide what projects are needed and where. The biomass from these

projects should count toward an RES that helps offset the cost of removal and stretch appropriated dollars toward the further improvement of public lands.

Finally, it's important to remember that forest resources are renewable. Although some biomass may be removed from public or private land, it will inevitably grow back and likely need to be removed again. There are roughly 20 billion board feet of new growth and 10 billion board feet of mortality on our national forests every year. In contrast, there are (on average) two billion board feet of removals. As we discuss the sustainability of biomass, which is imperative, we cannot forget that we are losing ground in our efforts to restore public forests. We also must remember that creating a viable biomass market through an RES will help protect private forestlands from development and safeguard the environmental and economic benefits on which we all depend.