

MAY 8, 2009

SOCIETY OF AMERICAN FORESTERS

TESTIMONY

HOUSE AGRICULTURE SUBCOMMITTEE ON CONSERVATION, CREDIT, ENERGY,
AND RESEARCH

HEARING

TO REVIEW THE IMPACT OF THE INDIRECT LAND USE AND RENEWABLE
BIOMASS PROVISIONS IN THE RENEWABLE FUEL STANDARD

On behalf of 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, please accept the following testimony for the Hearing Record on the Renewable Fuel Standard (RFS) held May 6, 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 House 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 RFS needlessly limits the management options available to federal land managers, and diminishes the market incentives available to private forest landowners that allow them to resist development pressures and maintain their land as forests. We commend the House Agriculture Committee'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. 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 and 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 has little to no value. An appropriately structured RFS would help to create a market for woody biomass. This, in turn, would encourage much-needed forest health or fuels reduction projects by offsetting the some of the cost of biomass removal. The current RFS, with its restrictive, one-size-fits-all definition, encourages the opposite.

Concern for the sustainability of biomass power generation has led to a prescriptive, process-based approach. The 2007 Energy Bill's RFS definition of "renewable biomass" is prescriptive and restrictive. 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, such a prescriptive definition serves as a disincentive to restore forest health in many areas, because federal requirements are too onerous and, in some cases, even contradict necessary silvicultural treatments.

Alternatively, an outcome based approach, with a broader definition of "renewable biomass", would give 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 or harvest 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 needs and goals of a particular forest. 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).

In regard to public lands, the SAF believes the laws and regulations that preceded the 2007 Energy Bill, such as the National Environmental Policy Act (NEPA), National Forest Management Act (NFMA), and the Federal Land Policy and Management Act (FLPMA), more than adequately provided requirements for the sustainability of biomass removal. Past biomass definitions have excluded areas such as Wilderness, Wilderness Study Areas, and inventoried Roadless areas. These definitions, too, although politically popular, make little sense from a forestry perspective. Some of these areas, for example, 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 RFS that helps offset the cost of removal and stretch appropriated dollars toward the further enhancement of public lands.

Our 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 RFS will help protect private forestlands from development and safeguard the environmental and economic benefits on which we all depend.