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**Sent:** Sunday, November 04, 2007 9:39 PM

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**Subject:** FFAC: Biomass Comments

Here is a copy of Oregon Wild's Position Statement explaining how biomass can fit into a restoration program, but that biomass could also be counter-productive, so it must be channeled towards productive ends.

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## Biomass Utilization Policy

"Biomass utilization" is a term used to describe small diameter trees and understory vegetation removed from forests and put to a variety of uses such as electricity generation, dimensional lumber, fencing, framing material, poles, firewood, furniture, chips, pulp for paper, etc. Oregon Wild supports conservative biomass utilization when it is a by-product of valid forest restoration efforts. After a century of well-intentioned but misguided logging, livestock grazing, and fire suppression efforts, many areas of our forests are degraded and need restoration. Habitat elements that are in particularly short supply include large blocks of unroaded forest habitat, large old-growth trees, hollow trees and large snags, and healthy streams, rivers, and wetlands. Not every acre of forest needs to be actively restored with chainsaws, but significant areas of degraded forest will benefit from careful management.

Any restoration effort involves certain risks. Biomass removal often requires the use of heavy equipment and logging roads that can cause short-term adverse effects on soil, water quality, and wildlife habitat. Decisions about biomass utilization must honestly account for these risks, and efforts must be made to avoid or mitigate them.

There are many different methods of forest restoration that are effective in different circumstances. One of the most effective and least expensive methods of forest restoration has proven to be controlled, low-intensity fire that moves harmlessly among large fire resistant trees while removing the smallest, most hazardous fuels. It is also clear that some forest restoration will involve pre-treatment by carefully thinning small trees followed by the reintroduction of fire. It is very important that biomass utilization facilitate rather than impede the reintroduction of fire as a natural part of our forests. Biomass utilization will therefore likely be a short-term, transitional strategy that lasts until natural fire regimes can be re-established.

When developing plans for biomass utilization, the following guidelines will help ensure that this use of our forests will minimize the risks and maximize the benefits:

- Biomass utilization on federal lands should be a by-product of forest restoration prioritized according to the Governor's Strategy for Eastside Forest Health, and should be limited to utilization of small trees and understory vegetation, while protecting all fire resistant large trees. Biomass should be accessible from existing roads and should not require the construction of new logging roads;
- Biomass processing facilities, such as electric generating plants, must be conservatively scaled to ensure that the use of forest material is sustainable, taking into account the need to maintain high water quality, fish & wildlife habitat, soil integrity, forest plan land allocations and desired future conditions, scenic integrity, and social acceptability.
- Biomass projects should be designed to operate efficiently at a variety of scales in order to deal with supply uncertainties, e.g. power plants should diversify their fuel supplies and should be able to run efficiently at less than full power. This will help avoid the risk that our forests will be sacrificed in the event of unforeseen shortages of biomass supply.
- Biomass projects should conform to our nation's normal system of checks and balances including active public involvement and environmental safeguards.

Dead trees are an important part of a healthy forest and provide a wide variety of important ecological functions. Dead wood is used by a wide variety of declining wildlife species. In fact, Over 30% of all Oregon bird species use dead trees for nesting, foraging, roosting, and communication. Unfortunately, because large trees and snags have been selectively removed over the past several decades, there is currently a deficit of large snags across Oregon's forests, so biomass utilization should be designed to ensure that large snags and large down wood are retained in our forests to help restore this important under-represented habitat element.

### Forest Biomass: Curb Your Enthusiasm

- Economies-of-scale conflict with sustainability. Bigger is better for the market, but smaller is better for the forest.
- Fuel reduction must be strategic, near communities. Not every acre.
- Long-term supply of small trees is not sustainable. The first entry may be attractive, but the next entry should be with fire, not machines.
- Electricity is a relatively low value use of wood.
- Biomass efforts must be coupled with other economic activities ( e.g. logging) which may be counter to restoration objectives.
- Competing renewable energy sources are cheaper than forest biomass (e.g. wind).
- Increasing motor fuel costs do not bode well for a remote and dispersed raw material supply.

- Power infrastructure limitations: Grid connection is difficult. Wheeling power from where its generated to where it's needed is difficult.
- Cellulosic Ethanol is still a pipe dream. The "magic bullet" enzymes may never be found. Genetic engineering may be required to make weaker fibers, but is it wise?
- Chip trucks normally can't use logging roads.
- After logging, a second entry for biomass extraction will damage soils.
- We have limited control over both fire or fuels due to climate change.