



February 15, 2010

Forest Service Planning NOI
C/O Bear West Company
172 E 500 S
Bountiful, UT 84010

Re: Comments to Proposed National Forest System Land Management Planning Rule, Federal Register, Volume 74, No. 2, Dec. 18, 2009

To Whom It May Concern:

Thank you for the opportunity to provide input to the proposed new National Forest System Planning Rule (Rule). The purpose of this letter is to:

1. Introduce the Front Range Roundtable (Roundtable), a multi-organizational stakeholder group on whose behalf we are submitting this letter regarding the proposed National Forest System land management planning rule; and
2. Request that the proposed forest planning rule be updated to include a requirement that forest managers consider woody biomass and woody biomass utilization when they write or update forest plans. By consideration, we mean that forest planners should evaluate whether biomass utilization opportunities exist that would be feasible economically, ecologically, and socially.

The Front Range Roundtable (www.frontrangeroundtable.org) was founded in 2004 to serve as a focal point for diverse stakeholder input into efforts to reduce wildland fire risks through sustained fuels treatment along the Colorado Front Range. The Roundtable is a collaborative effort involving more than 150 representatives from more than 50 different organizations, including state and federal agencies, local governments, environmental and conservation organizations, the academic and scientific community, industry and user groups, and individuals organized to address forest health concerns, forest product utilization, and the use of biomass for energy in the ten Colorado Front Range counties.

The Roundtable has identified 1.5 million acres of forest land in the ten-county Colorado Front Range area in need of treatment. These acres are of intermingled ownership and are within the identified Colorado 'red zone' and wildland-urban interface (WUI). They also include vast areas of contiguous unhealthy/high risk forested lands. We have identified a number of roadblocks to accomplishing needed treatments, including the significant cost. One of the keys to reducing these costs, making forest management more palatable to local communities and increasing collaboration, is to facilitate the utilization of woody biomass that is produced through implementing priority treatments.

The reasons that woody biomass is not currently utilized to the extent that it could be include:

- The small diameter and low value nature of the material generated from treatment activities
- The lack of infrastructure to remove materials from the stump to the market place
- Small scale investments in conversion technology are difficult to finance locally
- Current mechanisms for demonstrating long-term supply are limited

Therefore, we request that consideration of opportunities for woody biomass utilization be a requirement in forest planning. By consideration, we mean that forest planners should evaluate whether biomass utilization opportunities exist that would be feasible economically, ecologically, and socially. The benefits from implementing woody biomass utilization when appropriate include the following:

- Social benefits
 - Reduce WUI wildfire risk and resulting erosion concerns
 - Protect municipal water supply and quality
 - Foster opportunities for collaborative partnerships across boundaries

- Economic benefits
 - Reduce per-acre treatment costs
 - Create local jobs
 - Provide usable products
 - Generate opportunities for wood-energy conversion
 - Allow more projects to qualify for Biomass Crop Assistance Program (BCAP) program (for energy conversion facilities)
 - Stimulate local economies
- Ecological benefits
 - Improve forest conditions, where appropriate, through greater capability to restore and maintain forest stands
 - Enhance watershed resilience, where appropriate, by reducing fuel loading and reducing the overall cost of treatment. Address climate change through:
 - Reduction in greenhouse gas emissions
 - Carbon sequestration
 - Reduced risk of carbon release by wildfire

The Roundtable appreciates your consideration in these matters.

Sincerely,

The Front Range Roundtable Executive Team



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