



WESTERN FORESTRY LEADERSHIP COALITION

Address comments to:

<http://www.westgov.org/wga/initiatives/wrez/comments.htm>

March 2, 2009

Western Governors' Association
Western Renewable Energy Zones Work Groups
1600 Broadway, Suite 1700
Denver, CO 80202

SUBJECT: Comments on Draft WREZ Documents

The Western Forestry Leadership Coalition (WFLC) appreciates the opportunity to comment on the draft documents for the Renewable Energy Zones. Our Coalition represents the seven western Regional Foresters and three western Research Station Directors, and the Forest Products Laboratory Director of the US Forest Service, and the combined interests of seventeen State Foresters in the Western United States and six Territorial Foresters in the Pacific Islands. The focus of our review was to provide additional insights into how bioenergy from forests may contribute or influence the work of your teams. Additional feedback on issues outside of the biomass resource may come from any of our members in separate comments.

Specifically we reviewed the following documents:

- *Resource Criteria Approved by the WREZ Technical Committee*
- *Qualified Resource Areas - Renewable Energy Resources Summary Table*
- *Technology Assumptions for Supply Curve Analysis*
- *WREZ Draft Preliminary QRA Map*

We recognize that the three primary "Qualified Resources" wind, solar and geothermal have geographic limitations and are frequently isolated from transmission. However, biomass resources associated with hazardous fuels reduction and other forest management activities also are geographically specific and must be used close to the source. The cost of transportation and handling of these forestry resources requires a large number of distributed uses, and therefore is generally limited to areas near forests. Almost by definition the areas that can support development of solar and wind resources are not forested. Geothermal resources may or may not be near forested areas. So we requested our membership to consider if there were significant areas of forest biomass resources that were also isolated, or plans in the works to expand bioenergy production at existing facilities that were faced with lack of transmission.

Most forest residues that are near an existing forest products processing facility would most likely be used at that facility to generate combined heat and power with the potential to provide excess power to the grid. So the issue is more one of ability for the existing transmission to accommodate expansion to include these facilities. We are also aware of interest by small community cooperative power providers to co-fire or have expanded stand alone biomass power. We encourage further exploration and inclusion of these points in the final report.

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While the statement made in the Resource Criteria document (page 2) is technically correct, it does not tell the whole story about the biomass resource.

“Biomass feedstocks can be transported to a power plant site. As a result, project locations depend much less on the location of the feedstock resources than other technologies assessed in WREZ. As a result of this siting flexibility, biomass projects will be added to REZs created for other location-dependent resources.”

It will be important for your team to remain familiar with and consider your recently released report *Western Governors' Association Strategic Assessment of Bioenergy Development in the West* because it suggests locations where efficiently scaled biofuels plants can economically be sited based on realistic economic assumptions. If these locations coincide with the WREZ areas, it will increase the likelihood that some will have sufficiently abundant biomass with short hauling distances. Market and other resource considerations will determine if the identified biomass resources is used in power, heat or biofuels and/or a combinations of these. Appendix B of this report provides the locations where plants would likely be located by states.

This report and other analyses have shown that there is a large amount of forest biomass in the western states that has a high cost to remove and transport because of the lack of nearby markets and /or higher value material to help cover the cost. We encourage the WREZ project to consider smaller scale, more efficient (CHP), development of distributed power so that more resources can be utilized with the least cost. Local use and local benefit of renewable energy is one of the major ways biomass can be part of the West's future energy portfolio.

We understand that a primary goal of the WREZ project is to identify areas in the west to expedite the development and delivery of clean and renewable energy to where it is needed. Wind, solar and geothermal are the renewables you have chosen to focus on for good reason. We also understand that you are not readily available to delineate zone boundaries specific to biomass at this time. Considering the project's primary purpose, we ask you create a space in your final report so the case can be adequately stated how woody bioenergy can play a significant role in meeting the west's energy needs. Building upon prior WGA reports as mentioned earlier may be a simple place to start. We stand ready to assist as needed. Please do not hesitate to contact Mr. Jay Jensen, WFLC Executive Director (jay.jensen@colostate.edu 303-445-4366) with any questions or clarifications. Thank you for your consideration of our comments.

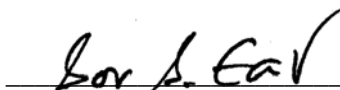
Sincerely,



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