N.C. Association of Professional Loggers, Inc.

August 8, 2009

Mike Linsenberger
Acting Director
Conservation and Environmental Programs Division
STOP 0513
1400 Independence Ave., SW
Washington, DC 20250

Re: Comments on the Biomass Crop Assistance Program (BCAP), Federal Register Vol. 74, No. 111, 6/11/09

Dear Mr. Linsenberger:

The N.C. Association of Professional Loggers, Inc. supports the proposed BCAP with the following suggestions:

Woody biomass does not have a spoilage or storage factor related to moisture content. Existing and proposed biomass conversion facilities would not be readily equipped to measure and convert to a bone dry basis of payment. We recommend an established 50% moisture content on incoming green woody biomass for payment calculations. This would be a forest industry acceptable standard for BCAP as provided by certified weight scales and would allow more facilities to participate.

Woody biomass is grown and owned by forest landowners. The ownership rights pass from the landowner to either a harvester (logger), wood dealer (broker), or direct to a purchasing facility. The material rights and subsequent payments typically follow a timber deed. The deed owner (any of the above) holds the timber, after payment in full to the landowner, and has a period of time, typically 1-2 years, to harvest and remove the materials. The rights can also pass by a 631-B sale where the landowner owns the timber up until the point it is severed at the stump. Payments are then made on a pay-as-cut basis. Woody biomass is just one of a multitude of forest products that are graded, sorted, and delivered to multiple wood purchasing facilities. Timber harvesters are uniquely positioned in the commerce of wood products to understand both the role of landowners as growers and facilities as raw material purchasers. As such the N.C. Association of Professional Loggers, Inc. offers to participate in sessions to make the BCAP a successful and easy to implement program at all levels. We can participate on advisory committees and lend expertise on traditional processes best adapted to woody biomass deliveries, tracking and payments to eligible material owners.

Furthermore, we applaud the decision to issue the NOFA without advance rule making or public comment as funds can be available immediately and the later rulemaking can strengthen the process.

Doug Duncan, Executive Director

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