



January 29, 2009

Secretary of Agriculture Tom Vilsack,
1400 Independence Avenue, SW
Washington, DC 20250-3355

SUBJECT: Advanced Biorefinery Guarantee Loans – rulemaking
Federal Register Notice November 20, 2008

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OF THE NORTHERN
MARIANA ISLANDS

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MARSHALL ISLANDS

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WYOMING

The Council of Western State Foresters represents the combined interests of seventeen State Foresters and six Pacific Island Foresters in the Western United States.

We appreciate the opportunity to comment on the Biorefinery Assistance Program, and request that you consider our comments as you finalize your rulemaking. Specific comments for each of the sections of the federal register notice are provided below.

Scoring to prioritize each proposed project:

We strongly support the identified need for biofuels projects that:

- have a positive impact on resource conservation, public health and the environment
- are biofuels production projects which will not have a significant negative impact on existing manufacturing plants or other existing facilities that use similar feedstock
- are projects that provide rural economic development, create local jobs

We applaud USDA for keeping the *definitions of advanced biofuel and renewable biomass* broad enough to utilize woody biomass that would not otherwise be used for higher-value products without the arbitrary exclusions of major sources of excess woody biomass from federal lands that is currently in the federal renewable fuels standard.

Of particular concern for the western US is development and demonstration of technology that is down-scaleable to utilize a more disperse biomass resource, and be flexible to use a variety of feedstocks that may be locally available from forest and rangeland restoration projects. It is difficult for these projects to compete with larger scale projects due to economy of scale, so providing some specific points or set aside for these projects to compete separately may be helpful.

The scoring of first-of-a-kind technology, system or process could be expanded to include innovations in scale and address the need for innovations in scale as well as process.

Thank you for the opportunity to comment on the design of this important new program in USDA.

Sincerely,

Pete Anderson
Nevada State Forester and
Chairman, Council of Western State Foresters