

Statement of

Joseph M. Hinson, Maryland Licensed Forester #765

In Support of SB 695 and HB 1140

I'm a consulting forester, located in Salisbury, and I work for both companies currently manufacturing commercial firewood as well as those who are actively exploring the possibility.

A few comments about the kind of trees that make their way into commercial firewood. These are generally smaller, suppressed trees within stands of larger, more valuable timber. Most will drop out of the stand naturally over time. Utilizing them for firewood captures their value and allows foresters to concentrate growth on the more desirable trees left in the stand. A common logging prescription on the Eastern Shore is to thin pine stands and leave oaks and hickory which have high wildlife values and remove sweet gum or maple, which do not. This diversifies the stand and improves wildlife habitat. The other source of firewood logs is the huge volume of trees removed by tree care companies, to clear up storm damage or improve road or utility rights-of-way.

USDA APHIS has always certified that firewood dry kiln operations as adequate to control Emerald Ash Borer as part of its nationwide control strategy. The agency issued a compliance label to be attached as part of each shipment and this allowed the firewood to be transported across state lines and to states with formal ash borer control programs. This was also deemed adequate for states that didn't have emerald ash borer issues but were concerned about other pests like spotted lantern fly. However, USDA has stopped all regulatory programs for emerald ash borer including entering into compliance agreements with kiln operators and providing USDA certificates for heat treatment of hardwood firewood for emerald ash borer.

For the time being, USDA still certifies that firewood dry kilns in Maryland are operated at standards to control gypsy moths since Maryland is in a gypsy moth quarantine area. However, there have been indications that USDA will stop certifying dry kiln operations as adequate to control this pest, too, in favor of state regulations and kiln certifications. North Carolina is one state that has foreseen this possibility and developed its own program for firewood operations in that state.

Maryland has no authority to certify that kiln operations to dry or heat treat firewood as adequate to meet either federal pest control standards or those of other states. If USDA were to drop certifications for gypsy moth control, existing companies would immediately lose access to markets in at least eight states, and, since larger companies have no ability to control shipments to individual states, in practice, the company's wood could not cross state lines. This would end their operations.

The highest heat treatment to control plant pests on firewood shipments is 160 degrees F. for 75 minutes. Firewood dry kiln operations far exceed this (250 degrees for 36 hours). Kiln certifications by USDA include annual physical measurements of kiln temperatures accompanied by reviews of the company's computer-generated kiln records. It requires about a day of USDA staff time.

SB 695 and HB 1140 authorizes DNR to establish a voluntary program to certify that dry kilns for firewood are operated in a manner that meets federal and other state's requirement for heat treatment for pest control, just as USDA has traditionally done. This would not be a large program, requiring only some training of the appropriate staff person and one or two site visits per year, a small but vital program. It will allow continued operation of existing operations and remove an instant, insurmountable barrier to those in western Maryland who might enter this market.