

October 20, 2010

Commissioner Giudice
Massachusetts Department of Energy Resources
100 Cambridge St.
Suite 1020
Boston, MA 02114

Dear Commissioner,

The Granite State Division of the Society of American Foresters (GSD-SAF) is comprised of over 195 practicing professional foresters in the state of New Hampshire. We would be negligent in our professional responsibilities if we did not comment on the proposed DOER rules regarding the use of woody biomass for electrical generation. The proposed rules will have significant impacts to the entire northeast forest community if enacted as currently written. GSD-SAF feels that both the proposed restrictions on forest product removal and efficiency ratings of biomass plants will inhibit the ability of forest landowners to sustainably manage their lands and discourage future projects that utilize wood as heat and power sources.

Energy from wood products is one of the most environmentally responsible sources. Wood products are a renewable resource that sequesters carbon, offsets petroleum and coal based energy, and is produced locally. In New Hampshire, we currently have seven wood-fired energy plants which consume approximately 1.2 million tons of biomass each year along with numerous, new smaller combined heat and power facilities at schools and municipalities. For over twenty years, we have grown more wood than is harvested to supply these wood-fired plants and other low-grade markets such as the paper industry and firewood. One only has to travel our beautiful scenic roads and highways to see that the removal of these forest products has not negatively impacted the visual quality of our state. The Granite state continues to be over 82% forested.

In terms of output capacity, wood is our most reliable renewable resource in the northeast. Our New Hampshire biomass plants run 24 hours per day, over 8,000 hours per year which connotes an efficiency rate of 95 to 97 percent capacity. No other renewable energy source can come close to this level. 1.2 million tons of annual biomass replaces an estimated 425,000 tons of coal or 2 million barrels of oil. It should also be noted that growing and producing energy from biomass results in no net greenhouse gas emissions.

A healthy forest industry is essential to keeping Massachusetts and the rest of New England's forests as forests. The markets and infrastructure provided by this industry is the primary source of income for landowners to support ownership and maintenance. These markets enable landowners to economically grow, harvest trees and maintain forestland for many other social benefits, such as wildlife habitat and recreation. This income allows them to retain ownership rather than selling the lands for development. We note with considerable irony that your proposed rules apparently allowed the

unlimited use of woody biomass from forests being converted to "other uses" but imposes additional regulations and negative incentives on landowners who wish to sustainably manage their forest.

So our questions to you are:

- 1.) How do the energy leaders of the State of Massachusetts plan to realistically reach the stated goal of 25% use of renewable energy by 2025 without the use of woody biomass?
- 2.) The proposed limitations for the RPS do not provide adequate incentives for the use of biomass in the future. Is that the true intent of this bureau?
- 3.) We ask that you take more time for additional comments and studies pertaining to this issue. The reduction of the Massachusetts renewable energy certificates for biomass will provide severe, long-term negative impacts to the entire northeast forest products industry.

One of our goals, as environmental stewards, is to reduce our reliance on fossil fuels and not limit the use of clean, renewable energy. There is no silver bullet for resolving our dependence on fossil fuels yet the proposed rules seem intent on removing an important tool from the renewable portfolio. It does not sound responsible to us.

Sincerely,

Scott D. Rineer

Scott D. Rineer
Chairman,
Granite State Division
Society of American Foresters

Cc: Executive Committee of GSD-SAF