

I would like to focus on what I see as a major flaw in the present form of the APS Regulation. Regarding: Acts of 2014, Chapter 251, Section 2.

(a)... "that facilities using biomass fuel shall be low emission, use efficient energy conversion technologies and fuel that is produced by means of sustainable forestry practices;"

There exists no comprehensive, quantitative definition, much less regulations for "sustainable forestry practices". Until such time as said "practices" are scientifically defined and put in place it makes little sense to pursue an ambitious biomass program that could very well degrade our forests and actually contribute to climate change.

Government agencies in the Commonwealth that oversee our environment have not been taking the Climate Crisis into account in any real way in spite of the Global Warming Solutions Act signed in August of 2008! If Massachusetts is "to reach a target of a 25% reduction of Greenhouse Gas (GHG) emissions by 2020 and an 80% reduction by 2050" we will need our forests and forest soils intact and healthy, given that they are a crucial element of the much needed carbon sequestration required to meet the goals of the GWSA.

The commercial rush, seemingly enabled by some in government, to expand biomass production and plans to vastly increase pellet production and installations of pellet heating plants is counter productive to the goals of the GWSA. Until all the science is in and the data regarding the alleged "renewable" properties of biomass (as of now the time it takes for a cut and disturbed forest to regain the carbon capture that it had before logging has not been truly considered) are established it would be foolish to forge ahead with highly flawed regulations or guidelines.

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