



Samantha Meserve, Renewable Thermal Program Coordinator  
Department of Energy Resources, Suite 1020  
100 Cambridge Street  
Boston, MA 0211

August, 7<sup>th</sup> 2017

Dear Ms. Meserve,

On behalf of the Department of Conservation and Recreation (DCR), I would like to thank the Department of Energy Resources (DOER), for their continued effort to improve 225 CMR 16.00. DCR has been pleased with the ongoing collaborative relationship with DOER on this important issue. With the adoption of minor technical changes recommended by our staff, the Department feels confident that there will be adequate measures to ensure the sustainability of working forests located within the Commonwealth.

Private landowners are responsible for stewardship of over 70% of forest land located in Massachusetts. Central to their ability to conserve their forest for the benefit of all is maintaining the ability to grow and sustainably harvest forest products. Utilization of all wood products is essential to effectively meeting many long term habitat management goals. In addition, the local utilization of all wood products also supports the economic viability of landowners, foresters, mill owners and loggers across the Commonwealth.

Woody biomass energy products play a vital role in providing consumers with a reliable source of renewable thermal energy. In addition to providing rural communities with fuel diversity, woody biomass also has the added benefit of supporting forest stewardship across the Commonwealth. Expansion of wood based energy products has enabled the formation of lasting public benefits including the completion of wildlife habitat improvement projects and manufacturing waste reduction efforts.

The current draft of 225 CMR 16.00 and related "Guidelines" have made improvements to simplify the eligibility for woody biomass. DCR also feels strongly that small woody biomass generators be reconsidered for receiving upfront Attributes as a means to provide the technology with equal access to the residential market.

DCR is responsible for the stewardship of over 400,000 acres of public forest land including the drinking water supply for the largest metropolitan area in the Commonwealth, working forests, and sensitive ecological communities. DCR is committed to our mission of protecting and enhancing these resources for the well-being of all. To this end, the DCR would be happy to collaborate with DOER and DEP to continue the conversation to help refine 225 CMR 16.00.

COMMONWEALTH OF MASSACHUSETTS · EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS

Department of Conservation and Recreation  
251 Causeway Street, Suite 600  
Boston MA 02114 2119  
617-626-1250 617-626-1351 Fax  
[www.mass.gov/dcr](http://www.mass.gov/dcr)



Charles D. Baker  
Governor

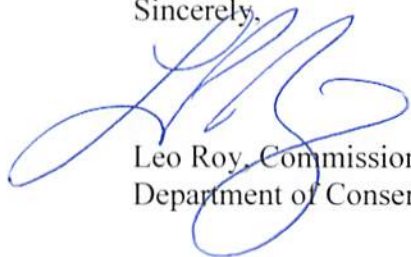
Karyn E. Polito  
Lt. Governor

Matthew A. Beaton, Secretary, Executive  
Office of Energy & Environmental Affairs

Leo Roy, Commissioner  
Department of Conservation & Recreation

Thank you again for your ongoing hard work on your concerted efforts to improve these APS regulations.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Leo Roy', written in a cursive style.

Leo Roy, Commissioner  
Department of Conservation and Recreation