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**Comments on RPS Proposed Regulations  
Delivered by Grant Richards**

Thank you for the opportunity to share feedback today. My name is Grant Richards, and I work for Cook Forest Products in Upton. We are a company that has both a landscape supply side and a land services side, which I oversee. In that side of the business, we spend most of our time on utility and road right-of-way clearings, storm cleanups, and land-clearing.

We're glad to see that the proposed regulations waive the efficiency standard for non-forest-derived wood. We create a lot of that wood in our utility and highway work. While we attempt to reuse the wood residues generated in our operations in the landscaping side of our business by turning it into mulch and other products, having multiple markets can help soak up the oversupply of this material generated by companies like ours as well as tree service companies and municipal public works departments. We're grateful for this proposed change and believe it makes a lot of sense.

However, we would encourage you to take another look at another proposed change – the removal of land-clearing wood from approved use in the RPS. While we understand the concern over deforestation, if a project is permitted and will proceed, allowing the resulting wood to be used productively to displace fossil fuels is better than letting it go to waste and rot, potentially releasing not only carbon dioxide but methane, a potent greenhouse gas.

I can tell you that no one is choosing to develop their land because of the return they'll secure on the timber and residues that are removed – land-clearing is a net expense for landowners. When we take on one of these jobs, we can't leave residues behind – everything must be chipped and removed. Therefore, changing the regulations for land-clearing wood won't affect the amount of land-clearing done – it will only encourage more of that wood to be wasted and release its carbon (and potentially methane) into the atmosphere. We strongly encourage you to reconsider this change and return land-clearing wood to approved use in the RPS.

Thank you for your consideration.