


## MEMORANDUM

**To:** Staff Working Group  
Regional Greenhouse Gas Initiative

**Subject:** Comment concerning Draft Model Rule

**Date:** 22 May 2006

Charles Vail  
Charles Vail Incorporated  
7333 Town Court South  
**From:** Lawrenceville, New Jersey 08648  
609-275-7066  
cvail@cvail.com



I wish to submit for your review the following two comments concerning Subpart **XX-1.2 Definitions**, item (f) *Biomass* (page 5 of the working document):

### First Comment

I suggest that the phrase

“Eligible biomass includes technologies that use....”

be revised to read,

“Eligible biomass consists of woody and herbaceous materials including....”

### Second Comment

The definition in the working document clearly includes, among other materials, most primary and secondary forest-product-industry wastes, residues, and by-products and some urban and commercial wood wastes, residues, and by-products. I suggest that your definition be expanded also to include (a) certain forestry (logging) wastes, residues, and by-products and (b) additional urban/suburban forestry wastes.

Forestry wastes, residues, and by-products to be added into your definition should include

parts of trees, such as tops and branches, and whole-tree chips excluding any commercial forestry materials, such as pulpwood bolts, sawlogs, and the like.

Urban/suburban forestry wastes to be added into your definition should include

any of the several woody materials generated as a result of urban tree trimming, right-of-way clearing or maintenance, and suburban land clearing, again excluding any commercial forestry materials.

Local markets will be the source of information used to determine what forestry materials should be considered commercial forestry materials.