



MEMORANDUM

May 26, 2006

To: RGGI Environmental & Energy Commissioners,
RGGI Staff Working Group, and
RGGI Stakeholders
From: Derek Murrow, Director - Policy Analysis
RE: Addition to Final Written Comments on the RGGI Model Rule Draft

Rockport, ME
Portland, ME
Hartford, CT
Boston, MA

In preparing our comments for the filing deadline, we omitted the following point and respectfully request that it be considered. Thank you for your review of this issue.

- **Recommendation 31:** In XX-1.2(f), definition of eligible biomass, include the following addition to the definition: virgin forest material must be harvested from certified forests (FSC, SFI, or equivalent).
Rationale: Biomass plants will approach carbon neutrality only if harvested material is from sustainably managed forests where increases of carbon due to forest growth are greater than or equal to carbon released at the plants. Although FSC and SFI do not directly address carbon stocks, we believe they are a suitable surrogate that allows for a higher level of certainty that the material comes from sustainably managed land rather than from activities such as clear cuts prior to development, which are not carbon neutral.