November 10, 2010

The Honorable Thomas Vilsack
Secretary, U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Vilsack:

USDA is currently holding forums throughout northeastern states to seek public feedback on the USDA Biofuels Strategic Production Report. As you noted in your introductory video remarks at these forums, biofuels production and use is a tremendous opportunity for our nation "if it is done right." Here in the Northeast, however, the Northeast Biomass Thermal Working Group (NEBTWG) and the Northern Forest Center believe that a strategy to do biofuels "right" can be enhanced to provide additional reductions in imported energy and the Northeast states can make greater contributions to the National goals.

NEBTWG is an informal network of individuals from business, government and the non-profit community, committed to advancing the role of biomass energy in thermal and combined heat and power applications in the northeastern US. The Northern Forest Center works through networks and partnerships to build a sustainable economy, revitalize local communities and conserve the landscape of the Northern Forest of Maine, New Hampshire, Vermont and New York.

While the desired outcomes of the Renewable Fuels Standards (RFS2)—increased energy independence, reduced carbon emissions, and "green" jobs and economic opportunities for American workers—have our full support, the narrow focus on liquid transportation fuels fundamentally misses the mark in the Northeast. **In our region, the best and most cost-effective way to achieve the desired outcomes of RFS2 is to reduce reliance on #2 heating oil by substituting with locally produced biofuels, including solid biofuels made from biomass.** With this strategy, the Northeast will make significant contributions to achieving the desired outcomes of RFS2 in ways that make sense for the economy, communities, and forest and farm landscape of our region.

1. **The Biofuels Strategy should be broadened to recognize that “biofuels” include much more than liquid transportation fuels.** Sustainable use of the Northeast’s productive forests for thermal energy can reduce heating oil consumption in the region by an amount more than double the ethanol and biodiesel production targets set forth in the USDA Biofuels Strategy.

The Northeast uses 84% of the entire U.S. supply of home heating oil. We consume 5.5 billion gallons of heating oil each year (which, according to EIA is more than all diesel fuel consumed for transportation in our region), sending almost $10 billion overseas to foreign nations. Rather than producing 423 million gallons of new biofuel—the target set out for the Northeast in the Biofuels Strategy—this region can reduce its heating oil consumption by 1.14 billion gallons annually by converting 25% of our thermal energy generation from oil to wood and other renewables. A strategy to achieve this goal is already in place, can be implemented with existing commercial technology, and will require no significant new

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1 “Northeast” is defined here as the six New England States and New York, a definition that differs from (and is smaller than) the Northeast region defined in the Biofuels Roadmap. That region also includes Michigan, New Jersey, and West Virginia.

infrastructure—stark contrasts to the complexity and expense of creating a liquid biofuels infrastructure where none currently exists. And, we know it can succeed as European nations have made huge advances in biomass thermal technologies.

2. The Biofuels Strategy does not address the fact that there are already significant and important economic uses of the forest feedstocks proposed for biofuel production in the Northeast. Rather than investing in a wholly new biofuel economy, federal energy policy should support the innovation already occurring in the Northeast to create a “green”, forest-based energy economy for the 21st century.

The annual contribution of forest-based manufacturing and forest-related recreation and tourism to the economy in Maine, New Hampshire, Vermont and New York alone is over $19 billion. What would the impact of the proposed Biofuels Strategy have on these existing industries, which employ over 90,000 people and rely on the same forest resource? We suggest that the $3.52 billion identified in USDA’s strategy as the cost for building 11 biorefineries in the Northeast would have a much more significant impact if it were invested in energy efficiency upgrades for the region’s aging building stock and in a more distributed thermal energy economy. Innovative, private sector approaches to these very issues are already taking hold in our region, and could benefit tremendously from even a fraction of the investment necessary for biorefineries.

We understand that USDA is responding to the mandates established in the RFS2, and that the latitude to interpret the statute is limited. Nonetheless for the reasons outlined above we strongly encourage USDA to incorporate a high level of flexibility in how different regions of our country achieve the energy security outcomes we all desire. Here in the Northeast we can make a tremendous contribution given our unique and significant dependence on #2 heating oil, but the current proposed policy prescribes actions for our region that are simply not the best solutions.

Thank you for this opportunity to share our perspectives.

Sincerely,

Charlie Niebling
Steering Committee, Co-Chair
Northeast Biomass Thermal Working Group
877-981-9663
Jaffrey, NH

Rob Riley
President
Northern Forest Center
603-229-0679
Concord, NH

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The undersigned 187 businesses, organizations, and individuals have endorsed this statement:

Joel Bowman  
President  
A.D. Bowman & Son Lumber Co., Inc.  
Castle Creek, NY

John Ackerly  
President  
Alliance for Green Heat  
Takoma Park, MD

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B & C Contracting  
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Vice President  
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Irvine, CA

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Vice President  
Biochar NorthEast  
Amherst, Massachusetts

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Board Member  
Addison Co. Relocalization network  
Middlebury, VT

Jon Strimling  
CEO  
American Biomass Corp.  
Goffstown, NH

Hugh McLaughlin, PhD, PE  
Director of Biocarbon Research  
Biochar Northeast  
Groton, MA

Scott Reedy  
Corporate Sales  
Advanced Recycling Equipment, Inc.  
Saint Marys, PA

Mark MacLean  
General Manager  
American Biomass Corp.  
Andover, MA

John McLaughlin  
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Biochar Northeast  
Leicester, VT

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AFS Energy Systems  
Lemoyne, PA

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Senior Engineer  
Antares Group Incorporated  
Fayetteville, NY

Douglas Clayton  
Board member and chair of Education Committee  
Biochar Northeast  
Jaffrey, NH

Mark T. leach  
President  
AFS Energy Systems  
Lemoyne, PA

Peter Pinette  
Owner  
Aroostook Energy Alternatives LLC.  
Fort Kent, ME

Dale Hendricks  
President  
Biochar Northeast  
Landenberg, PA

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Owner  
Agrotecy  
Lowville, NY

Walter J. Elish  
President and CEO  
Aroostook Partnership for Progress  
Caribou, ME

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COO  
Biofuel Boiler Technologies LLC  
Mifflintown, PA

Jeffrey P Combs  
President  
Aire Serv of NNY (Combs Heating and AC, Inc.)  
Watertown, NY

Arthur Hurlbut  
Engineer/Owner  
Arthur Hurlbut, P.E.  
Canton, NY

Charlie Cary  
Principal  
Biomass Combustion Systems  
Worcester, MA
Paul Paquin  
Purchasing Manager  
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Econoburn Boilers  
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Enfield, CT

Ann Blaney  
Customer Support  
Farm Credit East  
Manchester, NH

Gerry Ruestow  
Owner  
Fermata Consulting  
Unadilla, NY

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Director, Northeast Region  
Forest Guild  
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President  
Geneva Wood Fuels, LLC  
Chicago, IL

Jonathan Kahn  
President  
Geneva Wood Fuels, LLC  
Strong, ME

Harry Smith  
General Manager  
Green Clean Heat, LLC  
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Research Forester  
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Home Owner  
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President  
Innovative Natural Resource Solutions LLC  
Antrim, NH

Steve Maneri  
Director of Solid Wood Products  
International Forest Products  
Foxboro, MA

Daniel Moore  
Chief Operating Officer  
International Forest Products Corporation  
Foxboro, MA

Laura Sawall  
Marketing & Communications  
International WoodFuels  
Portland, ME

Bob Reemsnyder  
Principal  
Ironhand LL  
Old Lyme, CT

Peter Donohoe  
GM  
Jesse Lyman, Inc.  
North Conway, NH
<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Company/Title</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cody Lantz</td>
<td>Northeast Sales Manager</td>
<td>Laidig Systems, Inc.</td>
<td>Mishawaka, IN</td>
</tr>
<tr>
<td>Gerald J Levi</td>
<td>Owner</td>
<td>Levi's Outdoor Wood Boilers</td>
<td>Inlet, NY</td>
</tr>
<tr>
<td>Robert Lytle</td>
<td>Owner</td>
<td>Lytle's Heating</td>
<td>Heuvelton, NY</td>
</tr>
<tr>
<td>Chris Jensen</td>
<td>Sales Representative</td>
<td>Mainline Heating and Supply, Inc.</td>
<td>Ashford, CT</td>
</tr>
<tr>
<td>Scott Bradley</td>
<td>President</td>
<td>Mainline Heating and Supply, Inc.</td>
<td>Ashford, CT</td>
</tr>
<tr>
<td>Mark Tracy</td>
<td>Owner</td>
<td>Mark Tracy Heating</td>
<td>Oakland, ME</td>
</tr>
<tr>
<td>Carl LaVerghetta</td>
<td>Energy Project Development</td>
<td>Maryland Environmental Service</td>
<td>Millersville, MD</td>
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<td>David McKenney</td>
<td>Owner</td>
<td>McKenney Electrical Co., Inc.</td>
<td>Holyoke, MA</td>
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<tr>
<td>Harry H. Dresser, Jr.</td>
<td>Managing Director</td>
<td>ME Energy Systems, LLC</td>
<td>Bethel, ME</td>
</tr>
<tr>
<td>William Bell</td>
<td>Executive Director</td>
<td>ME Pellet Fuels Association</td>
<td>Portland, ME</td>
</tr>
<tr>
<td>Robert Lankletter</td>
<td>Owner</td>
<td>ME Woods Pellet Company LLC</td>
<td>Athens, ME</td>
</tr>
<tr>
<td>Derrick Borup</td>
<td>Member / Agent</td>
<td>Michigan Energy Works, LLC</td>
<td>Saranac, MI</td>
</tr>
<tr>
<td>Robert Bruce</td>
<td>Member</td>
<td>Mobilize Northern ME, Biomass to Energy Industry Cluster</td>
<td>Fort Fairfield, ME</td>
</tr>
<tr>
<td>Walt Elish</td>
<td>Administrator</td>
<td>Mobilize Northern ME, Biomass to Energy Industry Cluster</td>
<td>Caribou, ME</td>
</tr>
<tr>
<td>Matthew Bell</td>
<td>Tri-Chair</td>
<td>Mobilize Northern ME, Biomass to Energy Industry Cluster</td>
<td>Mapleton, ME</td>
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<tr>
<td>Nancy Morin</td>
<td>President</td>
<td>Morin Logging, Inc.</td>
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<td>Michael Fahey</td>
<td>Owner</td>
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<td>Rod Zander</td>
<td>Owner</td>
<td>New England Hearth and Soapstone LLC</td>
<td>Goshen, CT</td>
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<td>Wes Smith</td>
<td>Member</td>
<td>New England Outdoor Furnaces</td>
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</tr>
<tr>
<td>Steven J. Walker</td>
<td>President/CEO</td>
<td>New England Wood Pellet, LLC</td>
<td>Jaffrey, NH</td>
</tr>
<tr>
<td>Amanda Brosseau</td>
<td>Sales Administrator</td>
<td>New England Wood Pellet, LLC</td>
<td>Jaffrey, NH</td>
</tr>
<tr>
<td>Zenon Pawlowski</td>
<td>President</td>
<td>New Horizon Inc.</td>
<td>Sutton, WV</td>
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<tr>
<td>Christian Bach</td>
<td>Business Development</td>
<td>New American Biomass</td>
<td>Southwick, MA</td>
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<tr>
<td>Lisa Rixen</td>
<td>Chair</td>
<td>North Country RC&amp;D</td>
<td>Laconia, NH</td>
</tr>
<tr>
<td>Ron Aldrich</td>
<td>Owner</td>
<td>North Creek Auto/North Creek Heat</td>
<td>Little Falls, NY</td>
</tr>
<tr>
<td>Scott Piper</td>
<td>Owner</td>
<td>Northeast Mill Services, Inc.</td>
<td>Plymouth, NH</td>
</tr>
<tr>
<td>Matthew Bell</td>
<td>President and CEO</td>
<td>Northeast Pellets, LLC</td>
<td>Ashland, ME</td>
</tr>
<tr>
<td>Steve Bell</td>
<td>General Manager</td>
<td>Northeast Pellets, LLC</td>
<td>Ashland, ME</td>
</tr>
<tr>
<td>Michael Eisensmith</td>
<td>Director, Economic Development</td>
<td>Northern ME Development</td>
<td>Caribou, ME</td>
</tr>
</tbody>
</table>
Denis Berube  
Director of Planning and Transportation Services  
Northern ME Development Commission  
Caribou, ME

Adam Matthews  
Co-Owner  
Northland Energy LLC  
Salem, NY

Jason Holmberg  
President  
PA Pellets, LLC  
Ulysses, PA

Terry Parker  
Owner  
Parkers Plbg.-Elec.-Htg.  
St. Albans, ME

Andrew Boutin  
General Manager  
Pellergy LLC  
Montpelier, VT

Joe Spence  
Owner, Village Trustee, School Board member, citizen  
Pellet Fuel Supply  
Oxford, NY

Jennifer Hedrick  
Association Manager  
Pellet Fuels Institute  
Arlington, VA

Arie Van Vugt  
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Plainview Growers Inc  
Pompton Plains, NJ

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Account Manager  
PM Recycling  
Woonsocket, RI

Theresa Fowler  
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Presque Isle, ME

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Project Green Heat  
Derry, NH

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Vice Pres.  
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Raven Capital Inc.  
Willow, NY

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Principal  
Raymond J. Albrecht, P.E.  
Westerlo, NY

John Karakash  
Managing Consultant  
Resource Professionals Group  
Lewisburg, PA

Lee Landry  
Managing Partner  
reVision heat  
Hampden, ME

Jeff Forward  
Principal  
Richmond Energy Associates, LLC  
Richmond, VT

Rick Handley  
Principal  
Rick Handley & Associates  
Ballston Lake, NY

Sandra Pinette  
Owner  
Rock's Family Diner  
Fort Kent, ME

Rockwood Lake  
President  
Rocky Lake Plumbing & Heating  
Livermore, ME

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Co-owner  
Rolling Acres  
Southampton, MA

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VP Renewable Energy  
Sandri Energy, LLC  
Greenfield, MA

Bob Latour  
Operations Manager  
Sandri Energy, LLC  
Greenfield, MA

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Hanover, NH

Laura Colban  
President & CEO  
Skanden Energy  
San Diego, CA

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Executive Director  
Southern Aroostook Development Corporation  
Houlton, ME

Jon R. Montan, Jr.  
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St. Lawrence County Grass Energy Working Group  
Canton, NY

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Case Manager  
St. Lawrence Lewis BOCES  
Canton, NY

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SugarLoaf Stables  
Ashland, NY

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Dealer Coordinator  
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Lyme, NH
Brian Millette  
Parts Shipping & Receiving  
Tarm Biomass  
Lyme, NH  

Mary Wetherbee  
Administrative Support  
Tarm Biomass  
Lyme, NH  

Delores Drew  
Office Manager  
Tarm USA Inc  
Lyme, NH  

Scott Nichols  
President  
Tarm USA, Inc.  
Lyme, NH  

Sara Redmond  
Bookkeeper  
Tarm USA, Inc.  
Lyme, NH  

John Redmond  
VP  
Tarm USA, Inc.  
Lyme, NH  

Kyle Gibeault  
Program Manager  
Technology Transition  
Corporation  
Washington, DC  

Bede W. Wellford  
Business Development  
Thayer Corporation  
Auburn, ME  

John Thurston  
Sales Engineer  
Thayer Corporation  
Auburn, ME  

Dan Thayer, P.E.  
President and CEO  
Thayer Corporation  
Auburn, ME  

Alan Andersen  
President  
The A.L. Andersen Companies, Inc.  
Waunakee, WI  

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Co-owner  
The County Stove Shop  
Caribou, ME  

Boyce Holman  
Manager  
The County Stove Shop  
Caribou, ME  

Sonia Labbe  
Co-owner  
The County Stove Shop  
Caribou, Maine  

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The H.B. Davis Seed Co.  
Albany, NY  

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Owner  
Thornapple Farm  
Alexandria Bay, NY  

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Owner  
Thornton Hardware  
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Milo, ME  

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Sales Rep.  
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Gloversville, NY  

Douglas Hazlett  
Town Manager  
Town of Houlton  
Houlton, ME  

Jonathan Clark  
President  
Treehugger Farms Inc  
Westmoreland, NH  

Dot Abbott  
Extension Agent - Renewable Resources  
University of Delaware  
Cooperative Extension  
Dover, DE  

Stephen Poole  
Engineering/Sales  
Vermont Heating & Ventilating Company  
Winooski, VT  

Robert Foster  
Vice Chair  
VT 25X25 Alliance  
Weybridge, VT  

Netaka White  
Bioenergy Programs Director  
VT Sustainable Jobs Fund  
Montpelier, VT  

Katie Adams  
President  
VT Wood Pellet CO  
N Clarendon, VT  

Chris Brooks  
CEO  
VT Wood Pellet CO  
N Clarendon, VT  

Rodney Batchelder  
Mill Wright  
VT Wood Pellet CO  
N Clarendon, VT  

Tony Woods  
Regional Forester  
Wagner Forest Management  
Potsdam, NY  

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Warner’s Gas Service  
Vestal, NY
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President  
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Watertown, NY

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Vice President  
Wilson Engineering Services, PC  
Meadville, PA

Holger Mannweiler  
CFO  
Wood4heating Inc.  
Freeport, ME

Detlev Elsner  
CFO  
Wood4heating Inc.  
Freeport, ME

Lloyd C. Irland, Ph D  
Lecturer and Senior Scientist  
Yale School of Forestry and Environmental Studies  
New Haven, CT

Ger Crosse  
Head of Business Development  
Woodpecker Energy  
Tipperary, Ireland

Gretchen Saegh  
Director of Marketing  
WoodPellets.com  
Goffstown, NH

Justin Moran  
Director  
Woodstone  
Hingham, MA

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President and CEO  
Yankee Farm Credit  
Williston, VT

Shanna Ratner  
President  
Yellow Wood Associates, Inc.  
St. Albans, VT