



March 28, 2022

Mr. John Wassam
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Mr. Wassam,

I am submitting these comments related to the Baker Administration's proposed Renewable Energy Portfolio Standard changes on behalf of my family's 75-year-old business, Roberts Brothers Lumber Co., Inc. Since 1947, Roberts Brothers Lumber Co. has been sustainably managing local forestlands and manufacturing a variety of sustainable wood products from dimensional lumber to decorative bark mulch, firewood, and sawdust. A byproduct of our operations are paper quality wood chips.

As past President of the Massachusetts Wood Producers Association and as a former member of Governor Mitt Romney's Forest Advisory Council, I advocated for the sustainable use of low-grade wood for meeting responsible clean energy solutions. We had a great working relationship with former staff members at DOER who understood the value which sustainably sourced sawmill chips and logging waste could play in meeting our clean energy goals. I have continued to advocate for this issue as current President of the Franklin County Farm Bureau and as a member of the Board of Directors of the Massachusetts Farm Bureau Federation during the Patrick and Baker Administrations.

While there were some growing pains, we saw great headway being made when DOER agreed to a 60% CHP efficiency standard for RPS participation as a result of your commissioned *Manomet Study* in 2012. This policy incentivized responsible use of wood chips for combined heat and power. It also gave us sound evidence that use of wood chips for thermal energy can play a positive role in decarbonization efforts which resulted in Governor Patrick signing the thermal Alternative Portfolio Standard including 75% efficient modern wood heating in 2014.

The changes which you have proposed to the Renewable Portfolio Standard are discriminatory. There is no legitimate science to support that small CHP systems using wood chips are causing smoke inhalation for minority communities or low-income people. Your justification that this change is necessary to prevent developments like the Springfield Biomass Plant from being developed is untruthful as those large utility-scale plants were made ineligible for RPS qualification by the *Manomet Study* 10 years ago. All your proposed change will do is prevent municipalities, institutions, and small businesses like mine from choosing renewable energy technology that will benefit our communities. It will also greatly hurt agriculture as our small sawmills are barely able to survive as is. They need these clean energy markets to diversify their operations.

For the past several years I have been developing a project at our sawmill to gasify wood chips into two products, clean biogas and biochar. Such systems are popular in Europe and can convert sawmill residuals into gas for use in a clean burning anaerobic digestion-style engine while also storing carbon

in local soils. Projects of this type are carbon negative and have better emissions profiles than some of the anaerobic digesters already permitted to operate as part of the RPS. My company was told by DOER that the environmental justice map would be applied both to woody biomass combustion systems as well as biogas systems like ours if these systems use wood to manufacture the gas rather than manure or food waste. DOER's determination that biogas systems are the same as combustion plants is inaccurate and shows your Department's general lack of expertise in this area. Anyone familiar with bioenergy technology knows that there are extreme differences between using clean gas in an engine for heat and power and burning wood in a furnace to create heat.

I am respectfully asking the the Department reverse its decision to incorporate environmental justice changes to the Renewable Portfolio Standard for woody biomass. I am also respectfully asking that all biogas systems be treated the same under the RPS in respect to this environmental justice map if it is put into place for biomass combustion systems.

Yours Sincerely,



Leonard H. Roberts
President/CEO