



MASSWILDLIFE

DIVISION OF FISHERIES & WILDLIFE

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Jack Buckley, *Director*

July 12, 2017

Samantha Meserve
Department of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114

RE: Alternative Portfolio Standard Comments

Dear Ms. Meserve,

The Massachusetts Division of Fisheries and Wildlife (MassWildlife) is pleased to support the Department of Energy Resources (DOER) in its process to amend draft regulations for the Alternative Portfolio Standard (APS). The APS directly influences the ability of MassWildlife and other conservation organizations to conduct vital habitat management activities needed to conserve a substantial number of declining, threatened, and endangered species that are described in our State Wildlife Action Plan (SWAP: <http://www.mass.gov/eea/agencies/dfg/dfw/wildlife-habitat-conservation/state-wildlife-conservation-strategy.html>). The inclusion of biomass woody fuels in the APS allows MassWildlife and other conservation groups to market the substantial volumes of low quality wood products that must be removed to restore and maintain a range of critical wildlife habitats, including grassland, shrubland, and young forest habitats. In particular, conservation of globally uncommon fire-adapted ecosystems such as sandplain grasslands and scrub oak barrens are supported by the APS through removal of woody fuel loads that allow prescribed burning to be conducted in a safe and successful manner. While human health and safety have been greatly enhanced by the suppression of wildfire, those actions also create an obligation on our part to replace the essential habitats that wildfire formerly provided through a combination of sustainable harvesting and prescribed burning.

MassWildlife recognizes that renewable wood-based energy will provide only a limited portion of our total energy needs, but maintaining a wood-based energy component is critical for long-term conservation of wildlife resources throughout the Commonwealth. Allocating a 10% minimum of Alternative Energy Credits (AECs) for biomass woody fuels will work to align the climate goals of DOER with the wildlife conservation goals of MassWildlife. Sustainable harvesting of renewable wood products is a keystone tool for conservation of disturbance-dependent wildlife, and support for sustainable harvesting within the APS assists wildlife conservation through the maintenance of forest land. MassWildlife is pleased that the APS supports the range of ecosystem services that are derived from conservation of forested lands, including clean water, clean air, abundant wildlife, and mitigation of negative impacts from climate change.

Despite the fact that MassWildlife administers only about 6% of all the forested land in Massachusetts, our landscape habitat goals for state wildlife lands call for harvesting on 500-1,000 acres per year to provide needed young forest and shrubland habitats, and a substantial amount of low quality wood typically needs to be removed from these acres to achieve habitat goals for declining and state-listed species. The volume of low-quality wood to be removed from these sites ranges from 20-60 tons per acre, and using the midpoint of 40 tons per acre across 500-1,000 acres per year means that MassWildlife alone (exclusive of DCR lands) needs reliable demand for 20,000-40,000 tons of chipwood annually. In addition, MassWildlife administers funding for a habitat management grant program for

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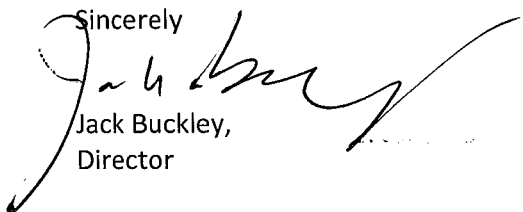
private and town conservation lands to do similar types of priority habitat management on about 200 acres annually, which equates to an additional 8,000 tons of chipwood annually.

Where there is little or no market for chipwood, the management cost for shrubland and young forest habitats can range from \$2,000-\$3,000 per acre, which precludes effective habitat management at a landscape scale. Not only does a lack of markets for chipwood raise the cost for vital habitat management, but it can also increase net CO₂ emissions over time because the energy that would have been produced from renewable wood products on lands retained in forest use is likely replaced by energy from non-renewable fossil fuels such as oil, natural gas, or coal. MassWildlife recognizes that wood-based energy has a higher initial carbon emission than energy from fossil fuels, but land retained in forest use will sequester carbon over time while mining for fossil fuels will not. Allocation of renewable energy credits for biomass and/or wood thermal systems that use chipwood from land that remains in forest use would be a substantial help for conservation of declining and state-listed wildlife species and avoid additional carbon emissions across the Commonwealth.

MassWildlife would also be supportive of provisions within the final APS regulations to favor consideration of wood thermal systems for municipal buildings, schools, and new residential and commercial installations. These types of incentives are a primary driver for the recent reintroduction in Congress of the Biomass Thermal Utilization Act of 2017. This approach would help establish a firm and enduring awareness on the part of citizens that local, renewable wood resources are providing heat and hot water for local residents while enhancing wildlife habitats and maintaining forest land in forest use. Given that wood-based energy is a proven and reliable technology, it seems prudent to ensure that a limited wood-based energy component is maintained within the Commonwealth's energy infrastructure in order to gain the additional benefits of enhanced wildlife habitats and other myriad ecosystem services.

Thank you for providing this opportunity for MassWildlife to comment on the amended draft regulations for the APS.

Sincerely



Jack Buckley,
Director