

MASSACHUSETTS FOREST ALLIANCE



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March 15, 2024

Commissioner Elizabeth Mahony
Department of Energy Resources
100 Cambridge St, 9th Floor
Boston, MA 02114

Commissioner Mahony:

Thank you for presenting DOER's Town Hall and allowing for public comment. DOER's plans for 2024 are certainly ambitious, and we have no doubt that DOER's experienced and knowledgeable staff will help DOER meet its aggressive targets.

As you implement Executive Order 594, we were glad to hear that you will help steer state construction to use materials lower in embodied carbon. Wood is one of the lowest embodied carbon building materials, and it would be even better if local wood could be used as part of this – supporting forest landowners in Massachusetts to conduct sustainable forest management that improves forest resilience.

DCR and EEA staff have been working on ways to support the local forest products industry and are examining a number of different strategies to encourage the use of local wood. It would make sense for DOER, DCR, DCAMM, and EEA as a whole to coordinate efforts on this, and it sounds like you are assembling an interagency group this summer to do that. We strongly support these efforts.

As is typical with public events, public comments in the chat revealed a lot of confusion, as some argued against forest management on state-owned lands, which DOER has nothing to do with.

There were many comments regarding modern wood heat in the APS. Some commenters referenced a bill in the legislature, which DOER has no control over. We assume your legislative staff are following this closely, but in the interests of clarification, here is some more information on that bill.

We believe the decarbonization value of modern wood heat has been conclusively proven by numerous peer-reviewed studies and is reinforced further by the use of sawmill residues in pellets and chips used in APS-eligible systems, which only improves the decarbonization value further.

Opponents have continued to complain about particulate emissions, although the modern wood heat systems eligible for the APS are more than 99% cleaner than an older wood stove, and DOER-commissioned research by UMass Amherst showed that when schools replaced oil boilers with wood boilers, the air quality improved, and the emissions were less harmful to human health.

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Nevertheless, we have heard the concerns and as a result filed a bill ([S.2132](#)) that offers a credit multiplier in the APS for systems that install an electrostatic precipitator (ESP) or other emissions control device. Since ESPs can essentially eliminate particulate matter emissions, if this is passed it will end air pollution concerns about modern wood heat.


This credit multiplier would apply to all modern wood heating systems in the APS, including, for fairness, those who have already installed such a device. ESPs can be 10% of the entire system cost, so an incentive is necessary to encourage adoption.

This bill was incorporated into the House Clean Energy omnibus bill ([H.3216](#)), and will likely be the subject of a conference committee with the Senate at some point this spring or early summer. We will continue to advocate for its passage.

Again, we congratulate DOER for a successful Town Hall and appreciate the transparency and communication. We stand by ready to assist in any way we can be helpful.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Egan', with a stylized, cursive script.

Christopher Egan
Executive Director