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*Protecting land and encouraging land stewardship in North Central Massachusetts*

July 10, 2019

Massachusetts Department of Energy Resources

Attn: John Wassam

100 Cambridge Street, Suite 1020

Boston, MA 02114

--- submitted electronically via [doer.rps@mass.gov](mailto:doer.rps@mass.gov) ---

Re: RPS Class I and RPS Class II Rulemaking - 225 CMR 14.00 and 225 CMR 15.00 - Joint Stakeholder Comments

Dear Mr. Wassam:

Mount Grace Land Conservation Trust is writing to share our informed opinion about the proposed changes to Massachusetts' Renewable Portfolio Standard ("RPS") Class I and RPS Class II Regulations put forth by the Department of Energy Resources (DOER). These changes would weaken the scientifically-based energy standard that heretofore has been an essential driver of the development of clean renewable energy resources in Massachusetts, and would negatively impact our forests, health, and clean energy goals.

As a land trust that promotes sustainable, site-appropriate management of forests, most disconcerting to us are DOER's proposals for substantially weakening biomass eligibility requirements. The present requirements were developed through a comprehensive process undertaken in the wake of public outcry over three large wood-burning power plants that were proposed in western Massachusetts. Mount Grace Land Conservation Trust encourages the long-term environmental and fiscal health of the region's environment, forests, and communities through small-scale, high efficiency uses of biomass material. The proposed changes to the RPS would promote unsustainably large-scale, lower efficiency use of biomass material, and are thus contra-indicated in a plan to promote sustainable forestry, cleaner energy, and a healthier environment.

DOER also proposes to eliminate Massachusetts-specific forest harvesting criteria, which are key to sustainable forestry management and bio sequestration of CO<sub>2</sub>. DOER's calculations grossly underestimate lifecycle CO<sub>2</sub> emissions from bioenergy by neglecting to also account for fossil fuels burned during harvesting, processing, and transport of biomass. Thus, DOER's biomass proposal incentivizes logging and burning trees for electricity without justification based in

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environmental or climate science. Besides increasing CO2 emissions and decreasing carbon sequestration, the proposed changes would allow polluting and inefficient wood-burning biomass power plants in Maine, New Hampshire and elsewhere that are currently ineligible for the MA RPS to receive tens of millions of dollars in renewable energy credits (RECs), and will incentivize new biomass plants to be constructed in MA and beyond our state.

Massachusetts' RPS—one of the longest-standing, most science-based standards in the nation—has not only been an essential driver of clean energy development in the state and the region, but it is also a critically important component of the Commonwealth's GWSA compliance strategy. The changes proposed to the RPS are based on a scientifically-flawed analysis. They are not good for the Commonwealth's forests or residents, and will set us back in our goal to move toward green energy and a cleaner environment. We strongly and respectfully suggest that they should be withdrawn. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'LY', with a stylized, flowing script.

Leigh Youngblood  
Executive Director