July 26, 2019

John Wassam
MA Dept. of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114

Re : 225 CMR 14 & 15 Proposed Changes

Mr. Wassam :

These comments address proposed changes in the biomass portion of the RPS Class I and II regulations.

I endorse the small steps proposed to simplify and make consistent some of the administrative aspects of the RPS and APS programs. Although the proposed changes should go much further and remedy the flawed methodology in the greenhouse gas calculations for biomass, the proposed changes represent some progress.

The proposed changes seem to recognize the fact that hundreds of thousands of tons of "non-forest-derived wood" are generated every year in the Commonwealth, and that incentivizing its local use is a common sense thing to do. Instead of allowing it to be dumped to rot and emit its carbon, or trucked away at great expense using fossil fuels, we should be incentivizing its use: it's local, it diversifies energy supply, it's what grows here, and it provides a modicum of self-reliance. Indications are that the amount of wood in this category will increase in the future – whether from storm severity and frequency, loss from insects and diseases, or utility operations to protect transmission lines.

I support the elimination of the efficiency requirement for installations using wood that is down or being cut anyway, but take issue with the proposal to eliminate landclearing wood from eligibility in the proposed revisions. No one is clearing land just to receive a renewable energy credit. The economics make no sense. This is really wood that is coming down anyway. I understand that, in DOER's view, the elimination of this category of wood is based on the assumption that the greenhouse gas equation is fundamentally changed if trees are no longer populating the cleared acres. This reasoning is part of the flawed foundational methodology underpinning the whole biomass eligibility system in the RPS. This methodology should take account of the fundamental growth/ drain and carbon uptake vs decay balance in the forests of the commonwealth. Even when the land use is being changed, the safety margin for the excess of carbon uptake over decay and release across the commonwealth is enormous.

I do not support the 5% limitation on the eligibility of forest-derived fuels, which again is based on a set of fundamentally flawed GHG calculations.

I support the qualification of forest salvage under the revised efficiency requirements. However, there is other forest-derived wood that should qualify as well under a revised framework, even if the underlying calculations are not corrected. The proposal to include eligibility for material generated as part of verifiable habitat management and restoration activities is sensible, but should be expanded in scope and be made exempt from the 50% efficiency requirement. The definition of qualifying material should be broadened to include that coming from habitat management activities explicitly called for in the State Wildlife Action Plan, as well as those habitat-based practices eligible for cost-sharing under the USDA-NRCS Index of Practice Standards in the MA Field Office Technical Guide.

My family owns two woodland properties in Massachusetts, both of which are third-party certified under the North American PEFC standard (American Tree Farm System). The limitations on RPS-qualified forest-derived materials coming from these properties in the course of management are unnecessarily limited and complex. I urge the Department to revisit the underlying protocols and calculations, and to remedy the deficiencies of the methods. Numerous sources have documented the flaws in Massachusetts' approach to the GHG calculations for biomass.

Thank you for the opportunity to comment.

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