



**Department of Parks, Buildings and Recreation Management**

*Administrative Office, Forest Park*

July 26, 2019

John Wassam  
Department of Energy Resources  
100 Cambridge St, Suite 1020  
Boston, MA 02114  
Email: DOER.RPS@mass.gov

Dear Mr. Wassam:

As public stewards and managers of valuable natural resources, the related environment, and the public interest in the Commonwealth, we welcome the opportunity to share some comments on the proposed regulatory changes to the Mass Department of Energy Resources (DOER) Renewable Energy Portfolio Standard (RPS), 225 CMR 14.0 and 15.0.

As a municipal agency that has the responsibility for overseeing a significant amount of street trees and over 3,000 acres of forested parks and conservation areas, many of which require slash clean up from earlier natural disasters, we laud and support the DOER's efforts to essentially expand the inclusion definition of non-forest-derived salvage wood by waiving efficiency limits.

The City of Springfield is continually confronted with challenges of disposing of woody materials originating from a variety of sources, such as routine tree trimming on streets and in parks, electric utility line clearance and tree maintenance, flood control tree maintenance, as well as frequent storms and occasional natural disasters. Taking steps to increase the demand and expand outlets for these materials is a positive measure. Although we concur with the direction DOER is taking on the points above, we are having trouble reconciling why woody materials generated from land clearing activities have been removed from RPS eligibility. Why now would a viable woody biofuel that has been historically eligible and utilized, and that will continue to be created owing to unavoidable progress and development be excluded?

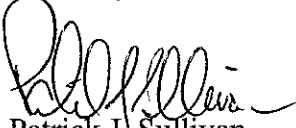
We, along with our counterparts and colleagues across the Commonwealth, concede that forest land use conversion will potentially negatively impact the environment. We need to protect the management of our Municipal Forested areas and not hinder the opportunity to limit the reuse/ disposal of slash and wood waste generated from these areas. Why not continue to utilize them locally in a positive manner to help offset the negative impacts? (i.e.: Cooley Dickinson Hospital, Growers Direct Farms both use woody bio fuels in their operations)

Furthermore, if this material is not used and left to waste, it will release its carbon anyway, regardless of where it is stored or disposed. We can also assume that non-sustainable inputs, with higher emissions, will be used in the production of energy where these materials would have been used otherwise. In this respect, the exclusion of municipal forested wood seems like a step backwards and counterproductive.

To conclude, we should be working towards the proper management of our forested areas and recognize our wood in Massachusetts as a valuable natural resource that when properly managed and utilized further enhances the overall goal of your department in reducing our carbon footprint. While some of the proposed changes support this, it seems others fall a bit short. We hope the latter will be reconsidered.

We thank you again for DOER efforts in proposing these regulatory changes and allowing us a voice in the process. We hope you consider our concerns as the process moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick J. Sullivan', with a stylized flourish at the end.

Patrick J. Sullivan

Executive Director, Department of Parks, Buildings and Recreation Management  
City of Springfield  
413-787-6444

Cc Park Commission  
Alex Sherman, City Forester