

June 7, 2019

John Wassam  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
via email at [doer.rps@mass.gov](mailto:doer.rps@mass.gov)

Dear Mr. Wassam:

The Appalachian Mountain Club (AMC) appreciates the opportunity to comment on the proposed amendments to the Massachusetts Renewable Energy Portfolio Standard Regulations (225 CMR 14.00 and 15.00). AMC is commenting on the draft amendments to the hydropower portions of the regulations through a joint letter under a separate cover, therefore these comments are confined to the proposed regulations in the portions related to biomass.

The Appalachian Mountain Club is the oldest conservation and recreation organization in the nation with the mission of protecting the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of America's Northeast and Mid-Atlantic regions. AMC's manages has 47,000 members in Massachusetts and manages Forest Stewardship Council certified forestland in Maine.

AMC supports the proposed change to remove trees cut in the process of converting forest land to non-forest and non-agricultural use from eligibility of woody biomass fuel. Trees removed as part of a process of permanent development cannot be reasonably considered renewable and should not be eligible for credits through the Renewable Portfolio Standard.

However, AMC has serious concerns about several components of the proposed changes, including the following specific concerns and questions:

- AMC opposes the proposed change that would apply no efficiency requirement to generating units that have over 95% of its fuel sourced from Forest Salvage and Non-Forest Derived Residues [14.05(1)7.c]. The Renewable Portfolio Standard is intended to incentivize relatively low or no-carbon sources of electricity generation. Woody biomass fuel is a carbon emitting source of fuel, and the efficiency standards required in the current regulations are appropriate to improve greenhouse gas emissions relative to other fuel sources. Removing an efficiency requirement is antithetical to the goals of the RPS and the Global Warming Solutions Act.

Furthermore, DOER doesn't appear to provide any analysis of whether there would be a consistent and adequate supply of Forest Salvage and Non-Forest Derived Residues. AMC is additionally concerned that adequate capacity does not exist now or in the long-term for the rigorous monitoring and verification of wood sources that would be required by qualifying different facilities with different efficiency requirements.



- AMC would appreciate a more explicit explanation of the reasons for the proposed change that would reduce the efficiency required of a Generation Unit from 60% to 50% to receive a full renewable energy attributes, especially relative to the anticipated climate benefits. With no clear explanation of the reasons for or implications of the change, it appears to be arbitrary, and the impacts should be clear for public understanding and review.
- AMC opposes the propose change that would remove the requirement for DOER to make the Forest Impact Assessment public no later than June 1 of each assessment year. Public disclosure of the assessment, and the evaluation methods used, is an important safeguard to understand the implications of policies and practices on the actual sustainability of the state and regional forests. Removing the requirement raises serious concerns about whether DOER would consistently meet this obligation and how scientific understandings of forest sustainability would be used and applied.

Overall, AMC urges DOER to make the science and rationale for the proposed changes readily available to the public for a full understanding of the implications for productivity toward greenhouse gas emission reductions and for the sustainability of our state and region's forests.

Thank you for considering these comments. Please don't hesitate to reach out with questions or to discuss further.

Sincerely,

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