



July 26, 2019

John Wassam
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
And via email at doer.rps@mass.gov

Re: Renewable Energy Portfolio Standards

Dear Mr. Wassam:

New England Forestry Foundation (NEFF) appreciates the opportunity to comment on the amended draft of the Massachusetts Renewable Energy Portfolio Standard regulations (225 CMR 14.00 and 15.00). NEFF has supported sustainable forest management and forest conservation in the Commonwealth since 1944. NEFF maintains relationships with dozens of private Massachusetts forest landowners through the 52 conservation restrictions we steward in the state and through active landowner outreach work in southern Worcester County, Berkshire County, and parts of Franklin County. NEFF also is a forest landowner ourselves, with over 8,000 acres of ownership in Massachusetts; we harvest most of our properties to demonstrate Exemplary Forestry™ and are very concerned with markets for forest products.

Finally, NEFF is deeply concerned with the impact of climate change on forests today and in the future. Scientific research has shown that large, old trees are experiencing increased rates of mortality. Drought- and fire-related mortality are also increasing. Addressing climate change is necessary to maintain the environmental benefits provided by forests. With respect to climate change and forest harvesting, NEFF advocates for high quality forestry that enables the growth of timber that is suitable for long-lived forest products that can substitute for steel, concrete, and other fossil-fuel heavy products used by society. We believe this is the best use of our region's abundant forests in light of the growing climate crisis, and we believe that use of forests in this manner can allow forests to provide a major wedge toward solving the climate crisis.

Harvesting forest products reduces carbon stored in the forest for a time following harvest, in addition to minor emissions of fossil-fuels carbon in conducting forestry operations. When long-lived forest products displace fossil-fuel derived products, some of the carbon removed from the forest is sequestered in the forest products themselves. Used in construction of a building, for example, forest products will be sequestering carbon for decades to centuries. This accentuates the role that forest products can play in solving the climate crisis. By contrast, forest products harvested for biomass electric energy production currently release carbon in the wood to the atmosphere quickly. As such biomass electricity production should be subject to close scrutiny.

To NEFF, it is increasingly clear that avoiding climate catastrophe will be difficult. Society has delayed action for so long that the pathway to a safe climate future is exceedingly narrow; society will need to seize nearly all opportunities to reduce emissions. And proposals that would loosen restrictions on emissions need strong justification. The proposed changes in the renewable energy portfolio standards do not appear to meet this strong standard; many of the changes loosen restrictions on emissions for reasons that are unclear.

With respect to forestry, the proposed standards weaken protections for soils and biodiversity in forest harvests. NEFF is working in the opposite direction; our Exemplary Forestry™ standards for the Acadian forests of northern New England seek to promote higher quality forestry that would retain forest legacies, improve wildlife habitat, and protect forest soils. We are developing similar standards for southern New England. These standards are more specific than the requirements of current certification programs or typical silvicultural definitions of sustainability. The existing RPS standards include many elements akin to our Exemplary Forestry approach, but the proposed revisions would eliminate most of these elements.

In short, there is not a forestry or climate justification for many of the proposed changes to the Renewable Energy Portfolio Standards. And in the long run these changes will undermine public support for biomass electricity and forest harvesting in general. They are not necessary for a strong forest economy, and we recommend DOER withdraw and redraft the proposed standards.

As part of any revision to the standards NEFF encourages DOER to particularly reconsider the following elements of the current draft standards:

- removal of standards on the percentage of tops and branches that must be left on site
- removal of protections for poor quality soils in terms of eligibility for credits under the Renewable Energy Portfolio Standards, and
- removal of requirements for protection of biodiversity features including snags, stumps, coarse woody debris present prior to harvest, and old growth stands.

One positive change in the proposed revisions that we would suggest retaining in a redraft is eliminating credits for material from non-agricultural land clearing. There is no need here in Massachusetts to incentivize residential and commercial land clearing. In fact the legislature regularly appropriates land protection funding toward the exact opposite goal. This improvement would be even stronger if it also applied to agricultural clearing so as to avoid creating a loophole to circumvent the intent of the regulations through a phased clearing and development.

Thank you for your time and attention.

Very truly yours,



Bob Perschel
Executive Director