



TOWN OF MONSON HIGHWAY DEPARTMENT

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July 26, 2019

Mr. John Wassam
Department of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114

SUBMIT TO: DOER.RPS@mass.gov

RE: Proposed Regulatory Changes to the Renewable Energy Portfolio Standard, 225 CMR 14 and 15.

Dear Sir:

Thank you for the opportunity to comment on the proposed regulatory changes to the Mass Department of Energy Resources' Renewable Energy Portfolio Standard (RPS Class I and Class II), 225 CMR 14 and 15.

As a small town in Western Massachusetts, with significant trees and forested lands, we support and appreciate the DOER's actions to expand and ease the process to qualify renewable wood for RPS utilization.

As we are continually challenged with storing, processing, and disposing of woody debris generated from severe storms, utility maintenance, annual tree trimming, and tree mortality issue from invasive insects, disease and drought, we welcome the potential of additional markets for this material and the increased use of renewable energy sources.

Any efforts to lessen the accumulation of stockpiled wood chips in the town and to reduce the costs of disposal of these materials are appreciated. Having been affected by multiple severe natural disasters in the recent past, we have a clear understanding of the burden of having to manage excess wood wastes. Increasing options to use this material in a productive manner, especially in the Commonwealth, makes the most sense.

It is surprising to us, however, that wood waste derived from land clearing activities has been removed from RPS eligibility. It seems this material holds the same benefit in displacing fossil fuels for power production as other forest and non-forest derived eligible materials and, to our knowledge, it has been included since the beginning of the program. What is the motivation for the removal?

We understand that forested land use change, especially for expansion projects, will carry negative environmental effects. But such projects in the town are thoroughly considered before approval and proceeding, weighing benefits against all potential costs. We expect these projects to continue in the future, so it will be unavoidable to not generate land clearing chips.

We see no justifiable reason to not utilize these chips as a renewable energy source. Not doing so will only leave them to decompose and emit carbon and other gases anyhow. Also, more undesirable fuels may need to be used for removal and disposal of these renewable materials. This all adds up, in our view, to unnecessary environmental impacts and increased costs. We would urge you and DOER to reconsider inclusion of these materials.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "John Morrell". The signature is fluid and cursive, with the first name "John" and last name "Morrell" clearly distinguishable.

John Morrell
Highway Surveyor
Chair of Monson Board of Selectmen