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RE: Comments on revisions to RPS regulations

Good Morning:

I am a forest landowner and Tree Farmer in the town of Hawley in western Franklin County. The 150 acres of woodlands we own have been managed to meet the American Forest Foundation's national Standards for Sustainability for nearly 40 years.

To be able to grow quality timber suitable for long term uses like furniture, flooring and housing that tie up carbon for 100 years beyond the trees' lifespan, we have to be able to remove other poorer quality competing trees to give the best trees room to grow. For that reason we need steady markets for low grade wood, often called chip wood. Such low grade materials compose about half the trees in our woodlands and despite having repeatedly thinned them over four decades, there is always more being created by weather, insects, or disease.

As a taxpayer, I am in favor of the proposed changes to the RPS regulations to reduce the restrictions on the qualification of chip wood generated from storm cleanup, salvage and utility and roadway maintenance, landscaping and tree work for utilization in generating RECs. Given the low value and poor markets for these materials, less regulation on their utilization is better than just having them release carbon and not use that natural carbon to reduce our dependence and emissions of fossil fuel carbon.

As the Fire Chief and Emergency Management Director for the Town of Hawley. I have helped deal with storm emergencies since 1984 including the 2008 ice storm, Tropical Storm Irene in 2011, and the 1995 derecho. Each of those events generated large volumes of storm damaged woody debris which had to be dealt with initially to get roads open and restore power, and subsequently to dispose of the massive volumes of chip wood. It is my concern that the Commonwealth continues to be unprepared to utilize the huge volumes of storm debris that even larger storms, such as a Class 3 hurricane, will generate.

Every week in Massachusetts, thousands of tons of waste wood are produced from normal maintenance of roads, power lines, landscaping, and tree work, as much as 1

million tons per year. This doesn't include forestry generated materials. Violent storms and destructive insects produce even more. Whenever trees are damaged or cut, the woody materials begin to release carbon dioxide back to the environment. State law requires that most of this wood be chipped up to minimize fire dangers, but chipping it simply makes it decompose faster releasing carbon faster.

Available markets to utilize these chips have shrunk, not expanded. Instead of being used, for energy or to make a long-lasting product, most of these chips are dumped wherever they can, wasting both the energy within and releasing their carbon. Day in and day out, these chips are one of the largest emitters of carbon in our environment, and probably the most overlooked.

When MEMA holds training for emergency managers about preparing for hurricanes or other violent storms, the standard for destructiveness is the 1938 hurricane, a Category 3 hurricane. In just 3 hours on September 21, 1938 the hurricane blew down 90 million trees in Massachusetts containing a billion board feet of timber, equal to 20 years consumption. Despite a major effort by the Roosevelt Administration to salvage usable timber and clean up the immense amounts of flammable debris with thousands of workers, only about 1/3 of the wood could be salvaged, the rest had to be gathered and burned. Even with those efforts, the number of wildfires in New England in the decade following was 500 percent higher than before 1938.

In their hurricane training, MEMA warns that because 80 years have passed since the last Category 3 hurricane hit here, tree damage from the next storm, whenever it occurs, will likely be much more severe because trees now are taller and more at risk to high winds. They also warn that it will take 6 to 10 weeks to restore power because of this.

In December 2008 northern Franklin County received 4 inches of rain with temperatures in the 20s creating a crystal wonderland of ice, shattered trees, blocked roads, and no power for elevations above 600 feet. In Hawley 40 of our 43 miles of roads were blocked by an average of more than 150 trees per mile. Using a team of 20 firefighters, highway personnel and loggers, we were able to reopen all roads in 5 days, which allowed the utilities to eventually get all power restored in 10 to 14 days.

While we were able to get the roads open and power restored fairly quickly, cleaning up the huge amounts of roadside debris took considerably longer. Most households in Hawley burn wood for heat, so the cleanup along the roads was mostly limbwood, not usable logs. Even so, it took more than two months to collect just the roadside waste wood which amounted to more than 515 truckloads, or an estimated 5,500 tons of wood.

Collecting the debris turned out to be the easy part. Finding a way to actually dispose of all this material proved much harder. The town had the first day's collection chipped up but the amount of chips generated in just one day was taller than a 2 story building. Because this was a weather event stretching from New York to southern Maine, dozens

of other towns faced the same issue, huge volumes of chips with no place to take them. You not only couldn't give them away, you couldn't pay people to take them.

With no nearby chip markets capable of absorbing them, and with the pile immediately beginning to heat up, the town ended up seeking permission to burn the waste wood (the cleanup was during the open burning season). Instead of anyone being able to utilize all this woody material (or that cleaned up in other towns) for energy and perhaps displace a sizable amount of fossil fuels, it ended up just as smoke and waste, adding to our global warming problem, not helping reduce it.

No one knows when the next major storm event will occur, but we know it is not a question of if it will occur, but when. When it does, we will again face cleaning up thousands of tons of storm debris. We cannot prevent storms from happening, but we can prepare to better utilize the debris rather than just letting it rot. Creating regulations that encourage building facilities to utilize the chipwood that we as a state generate annually would be good for both the environment, by reducing carbon emissions from the chipwood, and develop more capacity to handle the debris from storm events when they occur.

Storm debris and chipwood doesn't have to be waste wood. It becomes a waste when we don't put in the effort to find a way to productively use it.

In emergency services we say that to fail to plan for emergencies is to plan to fail. It is easy to put off planning for a major disaster like the next Category 3 hurricane by saying it is unlikely to happen soon. But normal weather variations in the last decade have resulted in the 2008 ice storm, the 2011 Hampden County tornadoes, Tropical Storm Irene, and the 2017 tornado in Ashfield & Conway. The next decade will certainly produce other major events that will generate huge amounts of debris.

The question is: will we still be as little prepared to deal with these materials as we are now? Are we just going to continue to let all this woody material go to waste and burn thousands of gallons of fossil fuels to get rid of it, or will we utilize it as a raw material to reduce our consumption of fossil fuels and emissions of greenhouse gases?

Improving the regulations to make it easier to qualify for REC credits is a good place to start.

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