

John Clarke
24 St. Mary's Drive
Jefferson, MA 01522
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Re: Proposed Amendments to 225 CMR 14 – Renewable Energy Portfolio Standard

MA Department of Energy Resources
100 Cambridge St, Suite 1020
Boston, MA 02114

To Whom It May Concern:

My name is John Clarke and I am a licensed, practicing forester, educated at the University of Massachusetts with dual majors in forestry and natural resource conservation. I am a lifelong nature enthusiast, hiker, and green industry stakeholder, and I feel compelled to share my thoughts on the presented regulatory changes. I would like to thank the DOER for preparing these regulatory changes and for accepting public comment. I would also like to commend the Baker/Polito administration for taking up the issue of reducing carbon emissions to mitigate climate change.

As I am sure you are well aware, within the Commonwealth our carbon emissions are contributing to the greenhouse effect, warming our global climate. In light of the federal administration weakening its environmental agencies, it has become increasingly important for carbon reduction to occur at the state level. I practice sustainable forestry in my daily business and know that there is opportunity for sustainably derived wood chips to provide local, renewable fuels for thermal, electric, and cogeneration facilities. These fuels are renewable and will directly replace fossil fuels, leaving ancient carbon in the ground and utilizing biogenic carbon for our energy needs.

As a forestry professional with decades of experience within the Commonwealth I can appreciate that the proposed regulatory changes will be met with considerable resistance from many who would wish our energy to be found elsewhere. While I differ from many of these individuals in my assessment of natural resources, I genuinely appreciate their commitment to environmental stewardship and best practices. To that end, I see the proposed changes to 225 CMR 14.00 as making perfect sense. Every day within the Commonwealth our need to mitigate arboricultural hazards creates enormous quantities of wood chips, most of which is either trucked out of state or allowed to decompose in place. From the moment these trees were identified as growing in the wrong place, their bound carbon, and its release was imminent (decomposition and combustion release exactly same amount carbon). This wood waste and its carbon is the byproduct of our desired social activity. The designation of these trees for removal was not determined by logger or land clearer but by a local parks manager, highway superintendent, public works planner, campus planner, or solar developer. I see the proposed regulation as recognizing these facts, allowing the resulting materials to be more locally, and more responsibly utilized.

While I enthusiastically support the majority of the proposed RPS changes, I am however confused to see that the proposed regulations no longer list land clearing material as an eligible feedstock. While this omission may be in deference to some who may believe its inclusion would promote the removal of forest they could not be more wrong. While I support the notion that land clearing is the greatest threat to the Commonwealth's forest, this material like that originating from the urban forest or utility

projects is preordained through the planned creation of our housing developments, college campuses, ball fields, solar farms, and so on. I therefore humbly propose that the DOER return land clearing-derived, clean wood to the list of eligible material with the provision that the clearing was first permitted. I see this nuance will prevent any speculative forest impacts and limit the material to that which was to be inevitably created.

I am asking both DOER and the Baker/Polito Administration to please take the responsible step of promulgating the regulatory changes while allowing chips generated through permitted land clearing activities to remain eligible within 225 CMR 14.00.

Thank you.

John Clarke