

MASSACHUSETTS FOREST ALLIANCE

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May 17, 2021

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Executive Director

Mr. Wassam:

The Massachusetts Forest Alliance represents forest landowners, foresters, timber harvesters, and forest products companies in advocating for a strong, sustainable forest economy. We are grateful for the opportunity to submit comments about the proposed revised changes to 225 CMR 14 and 15 relating to woody biomass.

As we said in our comments when these draft regulations were first proposed, we applaud DOER's efforts to simplify the process of qualifying woody biomass in the RPS regulations, which we were glad to see have been retained in the revised proposal. The existing regulations, while well-intentioned, were in practice a severe burden for foresters to comply with. Foresters estimated that compliance with the regulations would in some cases require them to double their time spent on a job, resulting in economic loss to them or the landowner, with no offsetting economic gain.

As a result, NO forest-derived woody biomass was used in either of the two eligible biomass combined-heat-and-power (CHP) facilities in Massachusetts. Instead, those facilities relied on material from land-clearing for development or solar, which is no longer eligible under the new proposed regulations.

The revised regulations take a simpler approach based on common sense and are in alignment with the qualification requirements for the Alternative Portfolio Standard (APS), reducing confusion for foresters and streamlining the process. We're glad that these changes have been retained from the initial draft.

We have no objection to the other recent changes proposed regarding woody biomass in the revised regulations.

Thank you for the opportunity to comment.

Sincerely,

Christopher Egan
Executive Director

Advocating for a Strong, Sustainable Forest Economy