



July 26, 2010

Mr. Phil Giudice, Commissioner
Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: Comments to the Massachusetts Division of Energy Resources on the Manomet Report

Dear Commissioner Giudice,

The Maine Forest Products Council and the Maine Renewable Energy Association appreciate the opportunity to comment on the recent report published by the Manomet Center for Conservation Sciences, titled Biomass Sustainability and Carbon Policy Study, released by MA DOER in June of 2010.

As you know, Massachusetts has been a beneficiary of Maine's bioenergy production, and our hope is to alert you to some of our mutual industry concerns in order to avoid conflicts born from this report and subsequent rulemaking.

The Maine Forest Products Council is Maine's leading advocate for the forest products industry. Collectively, we represent billions of dollars of annual economic impact to Maine and the region. We represent paper mills, saw mills, logging contractors, biomass energy facilities, truckers, foresters, and almost 9 million acres of commercial timberland. MFPC represents the forest products industry at the State Legislature and among various agencies, including the Maine Forest Service, Land Use Regulation Commission, and Department of Environmental Protection.

The Maine Renewable Energy Association (MREA) is a not-for-profit association of renewable energy producers, suppliers of goods and services to those producers, and other supporters of this industry. Our power producer members manufacture electricity in a sustainable manner from hydro, biomass, wind, tidal, and waste to energy. MREA represents the renewable power industry at the State Legislature and before the Maine Public Utilities Commission.

Given the magnitude of impact that a report such as this has on our collective memberships and forest management and wood use in the northeast United States, we thought it to be very important to weigh in on what implications this report and its subsequent interpretations by various stakeholders will have on those who utilize Maine's vast forest resource to produce renewable energy to protect our regional environment, economy, and move toward energy independence.

Maine's Woods are Working

The calculations and science of carbon lifecycles is complex, confusing, full of questionable assumptions, and therefore can be highly contentious. Our concerns with the Manomet report are focused less on its findings, and more on the interpretation and oversimplification it has led to, and will be led to by others. There should be no mistaking that the holistic value and benefits of a tree for various products, including its residues to fuel energy generation, far outweigh the carbon, economic, and security benefits of fossil fuels.

Biomass energy provides an array of benefits for Maine and the region by offering opportunities for locally and sustainably managed residues of renewable resources to be converted into cost effective energy alternatives.

One of the most highly identified concerns among our members is the fact that the Manomet research team elected to use a stand-level analysis rather than a landscape-level analysis of the time needed for biomass to reach carbon neutrality. While this type of analysis may be appropriate for some individual projects in Massachusetts, the same cannot be said for Maine, and the forest resource as a whole. It takes time for trees to grow back on individual stands, however on a landscape level, Maine now has almost double the amount of forestland that it had in 1950, and roughly 2/3 of the stocking inventory it had before commercial harvesting every began, according to the Maine Forest Service (Maine State Forest Assessment and Strategies, June 2010). Combined with that, Maine landowners will have certified over 8 million acres of forestland by 2012 through third party certification systems. Simply put, Maine's forests are healthy, thriving, and in many places, growing. This issue must be resolved only through science.

It is important to understand that the carbon we "emit" into the air is not new carbon. It is carbon that is already a part of the environment, as opposed to carbon that is newly released into the environment when burning fossil fuels for energy. Therefore, using wood residues for energy is a carbon-neutral activity because it does not release any new carbon into the air. The Environmental Protection Agency has never expressed disagreement on this point.

We are also concerned that a report as significant as this does not appear to have any formal peer review process associated with it. Knowing the policy implications that the assumptions outlined in the report may have, we would encourage the State of Massachusetts and Manomet to engage peers in a formal review process in order to ensure accurate findings that will be able to stand the test of time. Otherwise, the biomass industry across the country will have been painted with such a broad brush that the study fails to recognize the differences between proposed projects in Massachusetts, and operational projects in Maine and beyond.

Given the alternatives of coal and oil, it is critical to bear in mind that all energy generation sources have impacts, but renewable, indigenous, sustainably managed power such as biomass is undoubtedly part of the energy answer as we pursue a path toward securing our energy, environmental, and economic futures.

We would encourage you to continue to orient your rules in a manner that recognizes the opportunities for job creation, ecosystem benefits, rural communities and a growing desire to eliminate our demand on fossil fuels through the use of biomass energy.

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We will continue to monitor this process, and offer our assistance and guidance should you have concerns about what implications this report and these rules will have for the regional economy. Thank you for the opportunity to provide an overview of our concerns.