



20 Chapel St., Pittsfield, MA 01201
413-464-9402 • www.thebeatnews.org



Samantha Meserve
Department of Energy Resources,

Thank you for the opportunity to comment on the Clean Peak Energy Standard currently under development by DOER. Please accept the following comments from No Fracked Gas in Mass & the Berkshire Environmental Action Team (BEAT). BEAT works to protect the environment for wildlife in support of the natural world that sustains us all. No Fracked Gas in Mass works to stop the expansion of fossil fuel infrastructure in the Northeast states and to promote energy efficiency and sustainable, renewable sources of energy and local, permanent jobs in a clean energy economy.

Thank you for the opportunity to comment on the APS program once again.

The APS program, as it is, is not acceptable without the following modifications:

— **Eliminate incentives for burning wood pellets and chips.** We need to stop producing emissions by burning stuff.

Given our state's climate regulations under the Global Warming Solutions Act (GWSA), the APS should not allow any combustible fuels at all to reduce greenhouse gas emissions, protect public health and protect our forests. At a time when the Commonwealth is seeking to rely on carbon sink to help us reach net zero emissions, incentivizing industrial scale burning of wood pellets not only takes emissions in the wrong direction, but encourages unsustainable logging activities.

Wood burning furnaces and boilers release many air pollutants, including large quantities of finer particulate matter (PM2.5). It's in low-income communities of color and among sensitive populations such as the elderly, children and people with respiratory illness where the health effects of fine particulate emissions are most impactful, including higher mortality from COVID 19. Springfield, Massachusetts has the dubious distinction of having been named "The Asthma Capitol" of the United States for multiple years.

There should not be incentives for any combustion-based sources of energy, whether wood or municipal solid waste ("waste to energy"). Removal of biomass and

“waste-to-energy” from the APS, RPA, CES, and CPS was recommended by the GWSA Implementation Advisory Committee to make sure the Commonwealth meets our decarbonization goals.

— **Increase incentives for zero-emissions renewable heating technologies.** These should only be non-combustion methods, such as electrification of heating using high efficiency heat pumps powered by solar, wind and existing hydro power.

Because of residential wood burning, Massachusetts has the highest levels of particulate pollution in New England¹. For this reason, there should be heavy subsidies for supplementing homes currently heated primarily by wood with high efficiency heat pumps.

A recent study by Daymark² has shown that the combined capital and operating costs of biomass are for higher than the cost of ground-source and air-source heat pumps and solar thermal for hot water. The ratepayers of the Commonwealth should be supporting technologies that advance our climate goals AND cost us less, not more emissions-generating sources such as biomass and solid waste combustion.

Sincerely,



Jane Winn, *Executive Director*
Berkshire Environmental Action Team



Rosemary Wessel, *Program Director*
No Fracked Gas in Mass, A Program of Berkshire Environmental Action Team

cc:

Charles Baker, Governor of the Commonwealth of Massachusetts
Kathleen Theoharides, Secretary of Energy and Environmental Affairs

¹ Massachusetts tops New England in air pollution from wood burning, Partnership for Policy Integrity, August 1, 2017, <https://www.pfpi.net/massachusetts-tops-northeast-in-air-pollution-from-wood-burning>

² Alternative Energy Portfolio Standard Review, Daymark Energy Advisors, October 30, 2020, <https://www.mass.gov/doc/alternative-energy-portfolio-standard-review/download>