



# *The Commonwealth of Massachusetts*

HOUSE OF REPRESENTATIVES  
STATE HOUSE, BOSTON, MA 02133-1054

**MICHELLE CICCOLO**  
**STATE REPRESENTATIVE**  
15<sup>TH</sup> MIDDLESEX DISTRICT

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

March 31st, 2022

Dear Commissioner Woodcock,

I am writing to voice my strong opposition to the expansion of clean energy subsidies to biomass plants, as proposed in the new Department of Energy Resources Renewable Energy Portfolio Standard (RPS). I ask the department to reconsider its recently proposed changes to the regulations, which would allow several more biomass plants to receive ratepayer subsidies, despite biomass' detrimental health and environmental effects.

Specifically, we are opposed to Category B of the changes, which would exempt biomass plants from environmental justice community siting requirements, while supporting Category A and C, which support the changes required under the 2021 Climate Roadmap passed last year.

Burning biomass fuel energy creates, by weight, more carbon dioxide than coal. There can also be very high heavy metal content in the ash that escapes from biomass plants. Classifying biomass as clean, knowing that burning it emits ash that causes asthma, diabetes, and respiratory and cardiac conditions, is disingenuous. While the new proposal contains language that disqualifies new biomass plants within five miles of an environmental justice community from the clean energy subsidies, the fact still stands that biomass burning emits large amounts of atmospheric carbon and heavy metal pollution. As you know, last year Massachusetts passed legislation to be carbon-neutral statewide by 2050, and incentivizing biomass plants is a step in the wrong direction.

Further, the claims that biomass fuel is renewable are also misleading. Both wood and non-wood biomass can entail deforestation, which is devastating to entire biomes - not only in Massachusetts, but all of New England. While wood is renewable, the time horizons for renewal are generations long; many trees that are used in biomass fuel take upwards of 20-30 years to reach maturity. That amount of time can be even longer if they are planted in scarcely resourced areas, such as recently deforested land. In other words, every tree we burn today will take at least a quarter lifetime to recapture its equivalent carbon.

Biomass burning is hazardous to our health, our climate, and the entire New England environment. Clean energy subsidies should be used to incentivize truly renewable and non-polluting energy sources, not deforestation and atmospheric ash. I strongly urge the DOER to reconsider the new RPS proposal and continue to forbid biomass plants from receiving such subsidies.

Sincerely,

A handwritten signature in black ink, reading "Michelle Ciccolo". The signature is written in a cursive style with a large initial "M".

Michelle Ciccolo  
State Representative, 15th Middlesex District