



To: Massachusetts Department of Energy Resources (DOER)

From: The Sierra Club Massachusetts Chapter

Date: March 31, 2022

Subject: **Reject DOER proposed changes to 225 CMR 14.00 and 225 CMR 15.00 related to biomass**

On behalf of the 100,000 members and supporters of the Massachusetts Chapter of the Sierra Club we submit this testimony *in opposition to DOER's amendments* that reduce or completely eliminate the core requirements of the 2012 RPS rules which restrict biomass eligibility.

It is wrong to subsidize outsourcing CO2 emissions health hazards. A major, perhaps the major, effect of the proposed changes will be to *send millions of our ratepayer dollars out-of-state every year* to Maine, New Hampshire and other New England states to subsidize CO2 emissions in those states, worsen health from biomass pollution and increase environmental harm. (A typical 40MW biomass power plant burns more than a ton of wood chips a minute.)

Massachusetts residents don't want this. No doubt the logging and biomass industry has lobbied hard for the proposed biomass changes that gut climate protections and put public health at risk. A small interest group, such as the foresters, can hold great sway over the Baker administration because they are focused on the significant economic benefits to their small group while the cost and damage is spread over a large population - a classic example of a special interest crusading for benefits at the expense of the common good and public interest.

Back in 2012 over 100,000 people endorsed a ballot petition that would have banned biomass from the RPS. This was withdrawn when the DOER agreed to the current restrictive provisions around biomass.

We are here to tell you that the people you serve are outraged and insist that you withdraw these destructive changes.

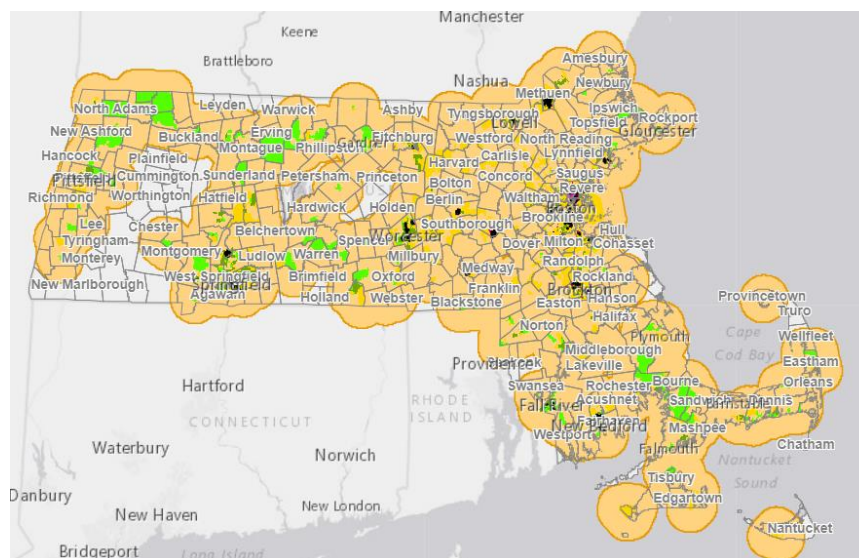
Clean electricity does not come out of smoke stack. Biomass power plants (a) produce more harmful particulate matter pollution than coal plants¹, (b) release more greenhouse gas emissions today than can ever be recovered before 2050, (c) result in the loss of CO2 sequestration from destruction of our forests and (d) deplete our soils and ecosystems.

Existing biomass plants out-of-state will be the beneficiaries of the proposed changes. The current Massachusetts biomass regulations properly restrict incentives for biomass in agreement with the scientific findings related to biomass. Massachusetts has only 1.9MW of biomass power that qualifies as RPS Class 1². The ability of a new biomass plant in Massachusetts to qualify for the RPS is unlikely given the fact DOER is maintaining the 60% efficiency standard for new biomass power plants and has added

¹ Per unit of electricity generated

² This is .03% of RPS Class 1 Renewable Generation Units. See <https://www.mass.gov/doc/rps-class-i-renewable-generation-units>

EJ siting restrictions, which it is proposing to limit only to new biomass plants. The map below³ shows that the EJ restrictions alone eliminate the possibility of a new biomass plant qualifying for the RPS in the vast majority of the state:



The orange areas show the required the 5 mile buffer zones around EJ communities.

What the new rules would do is allow dozens of existing polluting biomass power plants across New England to qualify for Massachusetts ratepayer subsidies through the RPS.

This is not the way to protect Massachusetts jobs. Arguments made about protecting Massachusetts jobs are short sighted. Most of the money and jobs (and industry profits) will be out-of-state to prop up failing biomass power plants with our clean energy dollars. Back in 2016 Dana Doran, Executive Director of the Professional Logging Contractors of Maine, said, “We need some assistance with the state of Massachusetts⁴”.

From a Massachusetts jobs and health standpoint we have much better options in-state via solar, onshore and offshore wind, storage, building efficiency and electrification. These in-state jobs are what we should be developing. The Climate Roadmap Law provides \$12 million per year to MassCEC to “provide workforce training, educational and professional development, job placement, startup opportunities and grants promoting participation in the commonwealth’s energy efficiency, clean energy, and clean heating and cooling industries⁵”. This is a good start.

Biomass is contrary to the Climate Roadmap Law. From the standpoint of the Climate Roadmap Law, the out-of-state biomass plants selling Renewable Energy Certificates (RECs) would allow Massachusetts to claim a higher amount of renewable energy against our emissions reductions mandates, whereas in reality the claim would result from subsidizing CO2 emitting plants beyond our borders.

³ <https://www.arcgis.com/home/item.html?id=814af836c5e04a84aa8298b993825827>

⁴ Maine Public Radio <https://www.mainepublic.org/business-and-economy/2016-01-15/maine-loggers-concerned-about-closing-biomass-plants>

⁵ <https://malegislature.gov/Laws/SessionLaws/Acts/2021/Chapter8> See Section 13.

From a health standpoint we would be subsidizing an industry worse than coal in particulate pollution affecting the health of residents in other states that don't have our EJ protections. Should we allow that?

Summary. DOER is renegeing on 2012 agreement. This is harmful for Massachusetts on many levels. We ask DOER to reconsider.

Respectfully yours,

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