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Massachusetts Department of Energy Resources  
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thermal.doer@state.ma.us, Subject Heading: PS COMMENTS

August 7, 2017

ATTN: Samantha Meserve

RE: Comments the Draft Changes to the Alternative Portfolio Standard  
Regulations - 225 CMR 16.00

Dear Director Judge:

***When the last tree is cut, the last fish is caught, and the last river is polluted; when to breathe the air is sickening, you will realize, too late, that wealth is not in bank accounts and that you can't eat money.***

*(Alanis Obomsawin, Abenaki, Quebec, CA)*

I am writing to express grave concern about the biomass and biofuels section of the new Draft Changes to the Alternative Portfolio Standard Regulations – 225CMR 16.00. Given the dire predictions about climate change and the uncertain future our grandchildren face as a result, these Regulations should be “turned upside down”.

As Mary Booth wrote in the [letter](#) to CEC Chief Executive Officer Stephen Pike, ***“Massachusetts has already given away millions of dollars of public money to promote wood heat and wood pellets. It is time for the Commonwealth, and all of its agencies, to stop promoting wood heat as a ‘clean fuel’ and focus on technologies that actually reduce air pollution and greenhouse gas emissions.”***

Moral courage and leadership will be required to combat the pressure that individuals within DOER and related state agencies and to rise above the temptation to repeat history, to engage in “*business as usual*” decisions among colleagues and those with financial and political capital. Perhaps the most important actions of your life will be required now, for

indeed, *“the climate clock is ticking!”* (From the title of the 201516 Bill S. 13 of the Massachusetts Senate Committee on Global Warming and Climate Change [tps://malegislature.gov/Bills/189/Senate/S13](https://malegislature.gov/Bills/189/Senate/S13) )

While these regulations may have originally been intended to improve public health and curb Greenhouse Gas(GHG) emissions, it is clear from study after study that these forms of producing dirty energy from forest to stack will only worsen prospects for public health and increase GHG!

Unfortunately, it is an undeniable fact that **subsidizing any combustible sources of thermal and power resources, will also worsen climate change** by removing the largest, cheapest, and readily available carbon sink, at the same time destroying more species with each acre of forest logged. 80% of which are used for wood fuels for industrial and residential purposes. (<http://sustainable-economy.org/wp-content/uploads/2015/11/Clearcutting-our-Carbon-Accounts-Final-11-16.pdf>) Certainly we need a small amount of forest resources for building supplies and furniture, but the dangers resulting from logging and burning biomass are too great to continue taking such substantial risks..

**Furthermore, should Commonwealth taxpayers really pay for such subsidies that increase our carbon debt and global temperature?!** Is this the best that DOER can do, given our current global dilemma?!

Having read the science and become familiar with Massachusetts policy directives and the GWSA, I believe that the reverse is true. The Commonwealth would do well to increase its financial health by **taxing industries which are polluting our air, land and water by burning dirty biomass fuel for heat and/or electricity.** (And any combustible thermal or power resource, whether, wood fuel, gas, coal or oil...) DOER should provide options to encourage Towns and property owners to leave their forests alone as Preserves.

Current forest management programs lose money, worsen the economy and increase the carbon debt. (Very few jobs are needed to cut forests with heavy-duty “fellerbuncher” type machines! On the other hand, foresters could be well-employed to help manage teams to physically remove invasive species and monitor health of forests and the biodiversity within them. Clearly a department-wide Climate Action Plan overdue yet imperative, one which leads us away from combustion and toward carbon storage. For, GIS mapping and the latest research point out that these same forests required before pellet manufacturing and chipping for wood fuel burners are conversely needed immediately as carbon sinks to help reverse climate change!

Massachusetts Taxpayers, largely without any knowledge of same, are currently paying at the federal and state levels (twice) for irresponsible policies driven by profit, not the latest science! What will it take for our government agencies to stop colluding with lobbyists and industry representatives who use deceptive, unsubstantiated language and financial rewards to woo them into taking steps that harm health and worsen climate change!

The time for handing out subsidies for combustion for heating and cooling or power is over! As a species which has brought on the *Sixth Extinction* at an alarming rate, we must stop supporting residential and industrial/commercial forms of biomass burning now, now just alter the regulations by small increments.

By backing the Increase of GHG emissions and increasing PM 2.5. from the whole life-cycle of burning chips or pellets, DOER is diverting valuable financial resources from non-combustion heat sources, such as solar thermal, geothermal and solar-powered air source heat pumps and mini-splits for heating and cooling buildings, (on a room-by-room, individualized basis)

These subsidies will also degrade the forests' ability to sequester carbon. Little known factoid: The US logs and degrades four times the forest ecosystems/resources than do nations within the Central and South American rainforest, creating a huge carbon deficit.

We need to fund new Commonwealth Carbon Trusts to help reduce our enormous carbon debt and to mitigate future climate change effects.

DOER should require biomass polluters to pay a substantial carbon tax, and use the funds to develop Carbon Trusts and help landowners and Towns set aside more forests permanently, *not* subsidize health-hazardous biomass combustion, whether residential or commercial/industrial scale.

Pay attention to good science by Massachusetts experts, such as Bill Moomaw, Ph.D. from Tufts and Woods Hole Research Center, to Mary Booth, PFPI) and Conservationist/Preservationist, Michael Kellett, (RESTORE the North Woods) not spokespeople for the industry and their lobbyists, spewing out deceptive marketing strategies that take our State and global temperature to a catastrophic brink of no return.

It is time for a Moratorium on any incentives for biomass combustion in our State. Massachusetts must again lead in paving the way for the authentically, verifiably cleanest energy and thermal options as possible! They are not only available, they are affordable. Weatherization and efficiency needs will boost our economy and provide good jobs for Massachusetts residents!

We must amend existing laws to remove biomass as a “renewable” energy source, **and amend the MA GWSA, adding a section on the protection of forests for the purposes of mitigating climate change.**

**Eliminate all subsidies for biomass now!!**

We must all do what we can now to place people and the welfare of all of our relations before profits, for aforementioned reasons, because “***There Is No Time To Waste: Our Climate Clock Is Ticking...***”(Title of the 201516 Bill S. 13 of the Massachusetts Senate Committee on Global Warming and Climate Change-[tps://malegislature.gov/Bills/189/Senate/S13](https://malegislature.gov/Bills/189/Senate/S13) )

Yours truly,

**Elizabeth Adams**, Massachusetts Forest Rescue Campaign