



August 20, 2021

Commissioner Patrick Woodcock
MA Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Via e-mail to DOER.APS@mass.gov

Re: Comments on APS Straw Proposal

Dear Commissioner Woodcock:

The Partnership for Policy Integrity (PFPI), a nonprofit research and advocacy organization headquartered in Pelham, MA, has reviewed DOER's APS Straw Proposal and has the following comments:

1) Massachusetts' clean energy programs must prioritize non-combustion technologies in order to meet the Commonwealth's greenhouse gas reduction goals and protect public health.

- PFPI supports the APS goal to "Prioritize the most greenhouse gas emission reductions for the least cost" (Slide 4).
- This goal should be further expanded to minimize emissions of fine particulate matter (PM 2.5) and other criteria pollutants which worsen air quality and contribute to a wide range of respiratory diseases and other health impacts, including increased risk of Covid-19 mortality, particularly in environmental justice communities that already are disproportionately burdened by pollution and pollution-related disease.
- A recent map prepared by DOER at the request of the Legislature's TUE Committee indicates that most of Massachusetts residents live in, or within 5 miles of, an environmental justice community.
- The latest "Asthma Capitals" [report](#) by the Asthma and Allergy Foundation of America found that three of the nation's "20 most challenging places to live with asthma in 2021" were in Massachusetts: Worcester (#11); Springfield (#12); and Boston (#18).
- According to PFPI's [analysis](#) of EPA's National Emissions Inventory data, in 2014, residential and commercial wood heating accounted for 83% of PM 2.5 emissions from the heating sector in Massachusetts, and 25% of the state's total PM 2.5 emissions. This percentage is likely to have increased due to the APS subsidies for wood heating that DOER adopted in 2018. Worcester County, which has consistently ranked among the top 20 "Asthma Capitals" in recent years had the highest PM 2.5 emissions from residential wood heating in the entire northeast.

2) Massachusetts should exclude all wood-burning technologies from the APS.

- The Baker Administration recognized the health risks to surrounding communities from exposure to air pollution from biomass combustion when MassDEP [revoked](#) the operating permit for the proposed Palmer Renewable Energy biomass power plant in Springfield in April. Subsequently, DOER added new provisions to its proposed biomass RPS [amendments](#) prohibiting biomass power plants located in or within five miles of EJ communities in MA from qualifying for the RPS program.
- At the very least, in order to achieve DOER's much-touted goal of achieving "consistency" between the APS and the RPS regarding the treatment of biomass energy – which has mostly taken the form of adopting weak APS regulations and then working to weaken the RPS regulations to match – the APS regulations should be amended to exclude woody biomass heating systems from eligibility if they are in or within 5 miles of an EJ community.
- However, to protect the health of all Massachusetts residents, DOER should be focusing APS thermal renewable subsidies exclusively on heating and cooling technologies that do not rely on combustion. Most of the state's residents live within five miles of an EJ community, and sensitive populations such as children, elderly people, and people with health impairments live in [every](#) community.
- While the APS statute, as amended in 2016, does include woody biomass as an eligible renewable thermal technology, PFPI and other groups submitted extensive comments during the APS rule-making process documenting that DOER's draft rules did not meet the statute's stringent eligibility criteria. Rather than strengthen the draft rules to address the environmental and health concerns that were raised during the public comment period, DOER [weakened](#) the final rules that were adopted.

3) PFPI opposes DOER's proposal to remove eligibility for non-emitting renewable thermal technologies such as Deep Geothermal Heat Exchange and Solar Hot Air (Slide 12).

4) PFPI opposes DOER's proposal to remove the provision that requires 30% of eligible woody biomass feedstocks come from Forest Derived Residues, Forest-Derived Thinnings, Forest Salvage, or Residues derived from wood products manufacturing consisting of Clean Wood (Slide 16). This will likely result in more whole trees being chopped down for fuel, the exact opposite of what Massachusetts should be incentivizing.

Thank you for this opportunity to comment.



Laura Haight
U.S. Policy Director