To: Commissioner Judith Judson

Massachusetts Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA 02114

Dear Commissioner Judson:

At a time when we should be exploring every means of taking carbon pollution out of the air, the straw proposal for the Clean Energy Peak Standard calls for adding more. Not only is this counter-productive to reducing greenhouse gases, but the particulates will add to issues for neighbors of biomass plants. The purpose of the law is to support cost-effective reductions in greenhouse gas emissions during peak periods of energy use. Using biomass to help when there is high demand means using an inefficient energy source which actually generates more net CO2 pollution than existing fossil-fueled power plants (per MWH of energy produced). I urge the DOER to update its position on biomass, take it out of the eligible mix, and stop incentivizing this dirty power source. We need to protect the sequestration ability of Massachusetts forests, particularly on public lands, not doom them by pursuing a technology detrimental to GHG reduction and to public health.

Sincerely,

Virginia A . Irvine

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