Commissioner Judith Judson

Massachusetts Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA 02114

Dear Commissioner Judson:

I am writing to urge you not to create additional incentives for biomass power generation through the Clean Energy peak Standard (CPS) process. The straw proposal, if implemented, will  increase greenhouse gas emissions (along with black carbon and health threatening pm 2.5 and other pollutants). It will support infrastructure for biomass, which is more costly to install and operate than alternatives such as solar energy that is a zero greenhouse gas source of electricity. I attach a statement from the Fifth Assessment Report of the Intergovernmental Panel on Climate Change that clearly demonstrates that bioenergy is comparable to coal in its carbon intensity when burned. I also attach a paper by Prof. John Sterman of MIT and Prof.  Juliette Rooney Varga of U. Mass. Lowell and  third colleague that clearly demonstrates how much greater are the emissions from burning wood than burning coal to produce the same amount of electricity. The CPS process should be replacing high emitting sources of greenhouse gases - not subsidizing them and undermining the goals of the Massachusetts global Warming Solutions Act.

I am a scientist with a Ph.D. from MIT ,and have been publishing articles on climate mitigation since 1989, and continue to publish on climate solutions. I am a co-author of five major reports of the Intergovernmental Panel on Climate Change, and also for the Massachusetts Climate Adaptation Report. I also chair the board of a major climate research organization.

It is an embarrassment that the Commonwealth of Massachusetts with all of its fine research institutions is ignoring the most basic science to subsidize adding more carbon dioxide to the atmosphere. I would be pleased to provide additional information so that our state can meet its impressive goals to address climate change.

Sincerely,

William R. Moomaw

Emeritus Professor and

Co-director Global Development and Environment Institute

Tufts University

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