



CARLOS GONZALEZ
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The Commonwealth of Massachusetts

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July 26, 2019

Commissioner Judith Judson
MA Department of Energy Resources
100 Cambridge St., Suite 1020
Boston, MA 02114

Dear Commissioner Judson:

We write to express our concerns over the proposed changes to the Renewable Energy Portfolio Standard (RPS) regulations by the Baker Administration that will adversely impact public health and the environment, as well as undermine the Commonwealth's Greenhouse Gas (GHG) reduction goals by increasing carbon emissions and decreasing forest sequestration. Our constituents in Western Massachusetts will be particularly hard-hit by the proposed changes, and we urge the Department of Energy Resources (DOER) to withdraw all biomass components of the proposed changes to 225 CMR 14 and 15.

In 2018, we passed a law to double the minimum percentage growth rate of renewable energy from 1% per year to 2% per year from 2020 to 2029. While DOER must update the RPS regulations to reflect this directive, it has also proposed sweeping new changes that go far beyond the legislatively-mandated RPS increase. The proposed rules would allow electricity retailers to meet the increased renewable energy goals by purchasing energy from polluting biomass power plants that currently are not eligible for the RPS.

Wood-burning power plants emit more carbon dioxide per unit of energy produced than even coal or natural gas and also emit harmful air pollution, including fine particulates, smog precursors, and carcinogens. In 2012, following a robust public process and extensive citizen engagement – including collection of more than 100,000 signatures to qualify for a ballot initiative – Massachusetts led the nation and world by adopting stringent science-based standards for biomass energy that recognized the significant environmental and public health impacts of woody biomass energy. As a result, Massachusetts is the only state in the nation that considers greenhouse gas emissions as criteria for biomass eligibility in its RPS, and only highly efficient plants can qualify.

Western Massachusetts citizens led the charge in developing these science-based standards after large-scale biomass plants were proposed in Russell, Greenfield, and Springfield, and our region will be the most impacted if the proposed rules are to take effect. Our region has some of the poorest and most disenfranchised communities in the state and would likely be where any new biomass plants would be sited. DOER's proposed changes would ensure that the Palmer biomass

plant proposed in East Springfield would qualify for \$5-10 million per year in renewable energy credits, in perpetuity, while adding more air pollution to a low-income and environmental justice community that already suffers alarmingly high rates of asthma, heart disease, cancer, diabetes, and other chronic health problems. Springfield has been named "Asthma Capitol of the U.S." by the Asthma and Allergy Foundation of America, and the American Lung Association rated Hampden County worst in the state for its high ozone levels in the 2018 State of the Air report.

In addition, Western Massachusetts is where the bulk of any timber harvesting and processing would occur to provide fuel for the dramatic expansion of woody biomass energy that the Baker Administration is envisioning. DOER is seeking to increase subsidies for wood-burning in all of the state's clean energy programs. We recognize the forest-products industry is facing economic challenges, but subsidizing polluting technologies that put Massachusetts residents at risk, negatively impact forest health, and undermine our greenhouse gas reduction goals is not the solution.

The climate crisis compels us to take a discerning look at our existing energy policies and strengthen programs that reduce GHG emissions. Climate change is occurring at an accelerated rate and its impacts are being felt in communities and across all sectors of the Commonwealth. Massachusetts' RPS has not only been an essential driver of clean energy development in the state and the region, but it is also a key component of the Commonwealth's Global Warming Solutions Act compliance strategy. Now is not the time to ease RPS stringency, and yet that is exactly what is being proposed.

The proposed regulations roll back or eliminate all of the critically important standards in the RPS that have ensured that no large-scale polluting biomass facilities, like the ones previously proposed for our region, are funded or built using clean energy dollars. DOER has provided no science-based justification for making these changes. While climate scientists are telling us we need to do more to protect our forests and reduce carbon emissions, these proposed regulations take us in the opposite direction.

We therefore urge DOER to withdraw all proposed changes to the existing biomass standards in the RPS. Thank you for the opportunity to comment on the proposed rule changes.

Sincerely,



Carlos Gonzalez
State Representative
10th Hampden District



John Barrett, III
House of Representatives
1st Berkshire District



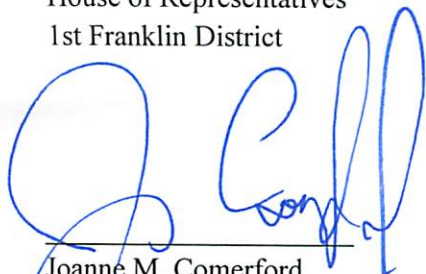
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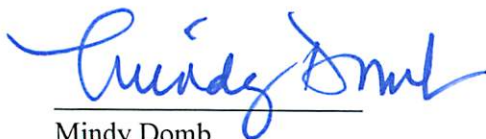
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