



Comments in Opposition to Proposed Biomass Eligibility Changes to the RPS
submitted to the Department of Energy Resources (DOER)
by the Massachusetts Sierra Club
May 12, 2019

The Massachusetts Sierra Club has over 130,000 members and supporters in Massachusetts for whom the proposed biomass eligibility changes to the RPS are cause for great alarm, for many reasons. Back in 2012 over 100,000 people endorsed a ballot petition that would have banned biomass from the RPS at that time. What we called “climate change” then is now the climate crisis. Science is clear: Time is now up. We have only a few years to dramatically reduce emissions, and we certainly cannot afford to go backwards. Thousands of citizens and Sierra Club members and supporters across the state advocated for raising the RPS last session because they know that the climate crisis is urgent. They did not lobby to increase the RPS only to see it watered down to include dirty energy such as biomass and waste to energy.

The idea in the proposal of extending the timeframe from 20 years to 30 years for biomass facilities to show a net reduction in CO₂ relative to fossil fuels is absurd. Any proposal whatsoever that incentivizes or facilitates increases in emissions, or inhibits transitioning to clean non-emitting electricity generation violates the GWSA mandates and violates the dictates of the UN IPCC report and the National Climate Assessment.

Not only must we reduce emissions, the IPCC report makes clear that we must now sequester CO₂ already emitted. Our forests in Massachusetts have by far the highest sequestration rate of any forests in New England because they are actively growing. When we kill trees we kill their carbon capture at the time we need it most – NOW – when there are no other effective means of sequestration.

Harvesting and burning is a non-renewable activity that depletes the soil needed for regrowth. Nature’s balance requires that wood decay in place in the forests.

DOER’s proposal would inflict immediate harm. It would:

- Increase pollution from particulate matter. Massachusetts cities and towns already have the highest asthma rates in the nation.
- Create a public and private health cost burden on the state and on families sickened by increased pollution
- Significantly degrade the quality-of-life of those affected by asthma
- Result in environmental *injustice* because wood-burning power plants would inevitably be sited near low income and disadvantaged people.

For these and other reasons the Massachusetts Sierra Club, its members and supporters, strenuously objects to all of the proposed biomass alterations to Class I and Class II RPS eligibility.

Respectfully submitted,

Paul Dale
Energy Committee Chair
Massachusetts Sierra Club
pauldale@massachusetts.sierraclub.org
cell: 617.794.0851

Deb Pasternak
Chapter Director
Massachusetts Sierra Club
deb.pasternak@sierraclub.org
office: 617.423.5775
cell: 617.852.2641