

June 6, 2019

John Wassam  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Dear Mr. Wassam,

**I am writing to oppose the inclusion of biomass as an energy generation source in the Renewable Portfolio Standards, both Class I and Class II.** I also oppose reconciling the two standards by choosing to push out the target date for attainment of renewable energy goals to 2050. I urge the Department to reconcile the differences by setting 2030 as the target date.

Thank you for taking my and other's testimony at UMass, Amherst on May 16, 2019 and on June 5 in Springfield. I appreciate that hearings are being held in Western Mass and especially that your Department decided to add the additional meeting in Springfield. People in Springfield will be the ones to be negatively affected by a biomass facility situated in their community. I had hoped that holding the meeting in Springfield would allow for more participation from those already struggling with asthma and other health issues related to air quality. Some Springfield residents did make it to testify about issues with asthma. While the original location in downtown Springfield is easily accessible via public transportation, the changed hearing site is more difficult to get to, especially in the evening, other than by car. This decreased the accessibility for some of those most negatively affected by current air quality in Springfield and those who will experience any negative effects of a biomass facility in their neighborhood. **I support the requests made last night for DOER to extend the deadline for written responses until the end of June. I urge you to make that decision today.**

**These hearings are good examples of a respectful conversation about things we perceive differently. We can move beyond divisiveness.** I appreciate the orderly and respectful way almost all of the speakers at that hearing presented their information. While I disagree with the conclusions those advocating for biomass inclusion in the RPS, I respect their right to be heard and appreciate their clear and respectful presentation of their point of view. I agree with those who spoke at the Amherst hearing who said that this is not and should not be a point of divisiveness, but a point of seeking understanding of each other. I believe that public hearings are important for allowing for various people and groups of people to weigh in on how our government functions in our interest. I hope the voices heard the written testimony submitted will be seriously considered by DOER.

**Decomposition and burning are not the same processes.** There were a number of statements and questions brought up concerning the larger picture of release of carbon into the atmosphere particularly at the Amherst hearing. We can't stop the decomposition of biological materials and the release of carbon into the atmosphere. Some people testified about the advantages of using the otherwise unusable wood as a source of energy production and equated burning and natural decomposition. Burning carbon is not the same as decomposition. The distribution of carbon and carbon dioxide as a greenhouse gas are different from one another depending on whether we are talking about decomposition in place or in terms transporting and burning. Even as a lay person, I understand that some of the factors that should be considered when thinking about the differences between these two

forms of releasing carbon and/or carbon dioxide include the differences in the process, time-frame, differences in particles and chemicals released into the air, and geographic distribution of the decomposing or burned materials.

**This department is not working on making wood-burning illegal in Massachusetts. That is another topic. This Department is considering whether wood-burning should be considered renewable energy that should be incentivized.** I do see merit in looking at the total picture. However, I urge this Department to work on the integrity of the RPS by not including burning any carbon as part of renewable energy. This Department is not prohibiting the burning of wood products in the Commonwealth. The question has to do with whether the RPS class I and class II will count burning as a clean, renewable energy source and provide financial support to biomass burning facilities based on their inclusion in the RPS. I understand the wisdom of a business decision on the part of the forestry industry to lobby for inclusion in the RPS. However, I don't believe it contributes to the integrity of the Commonwealth to encourage this activity through financial incentives. I think that the more realistic long-term message from the Commonwealth to the industry should be that they should exclude expectations of income from state-supported biomass facilities from their business plans.

**Creating a biomass incineration facility is the opposite of a renewable energy source.** I submit that biomass facilities create risk and/or harm to the communities and environments within which they are situated, and these should not be supported by the Commonwealth at all. I believe that supporting the increase of carbon-burning as a green, renewable energy source is not wise in and of itself. We should be supporting non-burning options for energy generation and energy consumption reduction. But, additionally, once a biomass facility is built there will be pressure to provide a consistent stream of material for burning. The operators of that facility will want to generate energy. The operators (now or in the future, who [by the way] may live far away from these facilities) may not agree with the regulatory standards set by the Commonwealth at this time. They may too easily justify streamlining incineration standards and procedures without direct contact with or input from those negatively affected by such decision.

**The current global anti-government movements need to be considered because this is the environment within which any biomass incineration facility will be assessed for public good versus private gain.** Government regulation and funding for enforcement of government regulations has been under attack nation-wide and worldwide on innumerable fronts. Other harmful materials released through burning legal or illegal materials (including particulates and chemicals) are a real potential risk to communities within which these facilities are located. I believe you do have an obligation to consider the larger picture. The larger picture includes the tremendous momentum to weaken government oversight of industries. This momentum and trajectory should be seriously considered by your department. In this case, I believe that means not supporting biomass burning. The President has been sweeping away regulations on health and the environment related to carbon-burning on a huge level. It is highly likely that concerted efforts are in the works and will continue to be made to undo regulations related to biomass incineration facilities by those people and entities interested in biomass as business income. Any biomass incineration facility, if successful, will be subject to sale. The health and safety of the people negatively affected by the output of biomass facilities will not be of relevance for the business plan of a far away owner focused on return on investment. This is a completely plausible outcome that DOER should not facilitate. If there is any facility, that facility will pose a continual risk or a source of harm to the community.

I understand you are presented with difficult decisions, but I believe these decisions are of great consequence in a critical time in history.

Thank you for your consideration.

Sincerely,

Edward Olmstead  
Florence, MA