

Testimony from David Roitman, Climate Action Now – Western MA, Re: Proposed Changes to the RPS

My name is David Roitman. I live in Florence MA, and I'm a member of the Steering Committee for Climate Action Now of Western MA. Over 3,000 people receive our newsletter and we're a leading voice seeking to reverse climate change and implement renewable energy, in ways that continue our path to becoming a just society. As an organization, we are opposed to the current push to change the RPS regulations, and see it as a misguided effort that will significantly weaken the Commonwealth as a leader on clean energy and climate change policy.

My comments about the proposed RPS changes fall into three categories: impacts on climate change, on clean energy, and on the Commonwealth's leadership role.

For impacts on climate change I'll highlight three impacts, although there are many more. First, by proposing to extend the timeframe for biomass facilities to show a reduction in GHG emissions, DOER is rejecting the strong finding from the IPCC and National Climate reports that we have about a decade to make significant steps towards reversing climate change through dramatic reductions in GHG emissions. Second, by allowing biomass power plants to extend the definition of forest residues, DOER would greatly decrease the amount of carbon sequestration in our forests, just when we need sequestration the most. Third, DOER's calculation for determining the lifecycle CO2 emissions from bioenergy ignores fossil fuels burned during harvesting, processing, and transport of biomass, yet these emissions can be considerable.

For impacts on clean energy I'll talk about two: First, calling biomass a "renewable fuel" is simply misleading. While it's true that wood grows back, during the time it takes to replace a tree, the value of the tree as a sequestration reservoir is lost. And while it's true that forest residues would "decompose anyway even if not burned," that process takes decades, while burning pumps carbon into the atmosphere instantly. So it's misleading to say that burning residues has an equivalent impact to allowing them to decay, and they are just as much "renewable" as solar or wind. Second, although it's true that the RPS is technically about "renewable" energy rather than "clean" energy, let's not miss the point that the impact of fossil fuels on human health, along with their impact on our climate, is a critical reason to shift towards "renewables." And although there are voices to the contrary, there is strong and consistent scientific evidence that burning biomass is harmful to human health. For example, consider this short quote: "The American Lung Association does not support biomass combustion for electricity production... Burning biomass can emit recognized air pollutants, including particulate matter and other carcinogens, which cause premature death and endanger respiratory health."

<https://www.lung.org/get-involved/become-an-advocate/public-policy-position-energy.html>

Finally, as a citizen of the Commonwealth, I've been proud of the ways we have been in the forefront in our adoption of solar and wind energy, and the ways our cities and towns have pioneered approaches like affordable community solar and Community Choice Energy. We commend Governor Baker for joining the governor's alliance to support the Paris Agreement. But the proposed RPS changes take us in the opposite direction. In short, DOER is proposing to use our primary clean energy program to incentivize logging and encourage inefficient biomass power plants that would release more CO2 per unit of energy than coal-fired plants. This is harmful policy – and will be harmful for generations to come.

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