

June 7, 2019

P.O. Box 556  
Southampton, MA 01073

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

**RE: Proposed Changes to the Renewable Portfolio Standard – Biomass**

Dear Mr. Wassam:

I am writing to express strong opposition to new proposed incentives for biomass power generation. I provided written and spoken testimony at the recent hearing in Amherst. This letter is submitted to provide more detail in addition to that testimony.

Keith Scholey, a producer of a new eight-episode series titled *Our Planet*, was recently interviewed about the plight of our environment on the Boston-based radio show, *Living on Earth*. He said, "Some of the things that are happening to our world right now are crazy. They're stupid.... Let's stop the silly stuff." He said the most powerful thing someone can do to help is to demand change.

Meanwhile, several miles away, you - our "public servants" in the Massachusetts Department of Energy Resources - are trying to ram through stupid and silly stuff that could not be more dire for human and environmental health. You propose to take money from ratepayers and taxpayers and hand it over as a bonus for burning wood to generate electricity, the least efficient electricity generation method on the planet. The devastating impacts would include: increased carbon dioxide emissions that disrupt the climate; increased air pollutants that kill 100,000 Americans each year; ravaged forests, wildlife, and rivers (commonly used for cooling water); mountains of ash waste; and degradation of the disadvantaged host communities from truck traffic, pollution, and noise.

I demand that DOER drop this crazy scheme to roll back hard-fought health and environment protections. Furthermore, DOER needs to allow more time for public comment. Many people are just now learning of DOER's plans and they deserve a chance to respond regarding something as important as this. No cram-downs, please.

Climate change is telling us to stop pitching pollution into the atmosphere. Yet governments continue paying industries huge bonuses to release carbon into the atmosphere by burning fuels from fossilized plants and—increasingly—live plants. Governments justify subsidies for

bioenergy by flawed<sup>1</sup> carbon accounting policies and a myth<sup>2</sup> that bioenergy is “carbon neutral.” This myth asserts that the regrowth of plants recaptures the carbon released from bioenergy, thereby preventing carbon from accumulating in the atmosphere. However, regrowth of plants can never be guaranteed, and even if regrowth occurs, it takes too long for bioenergy to be carbon neutral. Regrowth typically takes several months for agricultural crops and to up to 450 years for wood.<sup>3</sup> Though the carbon-neutrality myth has been disproven—for example, by the State-commissioned study by the Manomet Center for Conservation Sciences<sup>4</sup>—it persists tenaciously in government policies, except in Massachusetts - currently.

The stakes are high. Forestry is a huge source of greenhouse gas (GHG) emissions. Furthermore, when we cut down forests to feed greedy biopower plants, we remove natural “scrubbers” from our environment. Ecosystems remove significant amounts of carbon dioxide from the atmosphere and store the carbon in plants, dead organic matter, and soils.<sup>5</sup> For example, U.S. forests store 12 percent of U.S. GHG emissions each year.<sup>6</sup> Biopower destroys carbon storage capacity by killing plants and disrupting soils. Biopower harms the climate more than coal.<sup>7</sup> It thus delivers a “double whammy” to the climate.

Biopower proponents often claim<sup>8</sup> that they use only waste wood for fuel; however, biopower plants’ voracious appetite for fuel invariably requires that they also burn whole trees or even contaminated wood. In 2009, as many as five biopower plants were envisioned for Massachusetts. Animations<sup>9</sup> created using the state’s and project proponents’ own data show that to fuel these facilities, the state’s forests would have been logged in only 9 to 16 years.

The cheapest way to procure wood is by clear-cutting forests, which is standard practice. Biopower devastates forests and the ecosystem services they provide. The Earth has already lost half<sup>10</sup> its trees since human civilization began. Europe has exhausted its own forests, so forests in the southeastern U.S. are now being clear-cut and made into pellets that are shipped (using oil) across the Atlantic Ocean to supply wood fuel to biopower plants in Europe.<sup>11</sup>

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<sup>1</sup> <http://www.counterpunch.org/2015/11/18/clearcutting-our-carbon-accounts-how-the-timber-industry-shields-its-greenhouse-gas-emissions-from-public-scrutiny/>

<sup>2</sup> <http://www.sciencedirect.com/science/article/pii/S0301421512001681>

<sup>3</sup> <http://globalforestcoalition.org/wp-content/uploads/2015/11/LULUCF-paper-EN.pdf>

<sup>4</sup> <http://www.mass.gov/eea/docs/doer/renewables/biomass/manomet-biomass-report-full-lorenz.pdf>

<sup>5</sup> <http://www.fao.org/docrep/005/ac836e/AC836E03.htm>

<sup>6</sup> <http://www.whitehouse.gov/sites/default/files/image/president27climateactionplan.pdf>

<sup>7</sup> <http://reports.climatecentral.org/pulp-fiction/1/>

<sup>8</sup> <http://www.theguardian.com/sustainable-business/2015/oct/21/us-forests-under-threat-as-demand-for-wood-based-biofuels-grows-report>

<sup>9</sup> <http://www.maforests.org/Impacts.htm>

<sup>10</sup> <http://www.livescience.com/52070-global-tree-census-human-impacts.html>

<sup>11</sup> [https://www.washingtonpost.com/national/health-science/how-europes-climate-policies-have-led-to-more-trees-cut-down-in-the-us/2015/06/01/ab1a2d9e-060e-11e5-bc72-f3e16bf50bb6\\_story.html](https://www.washingtonpost.com/national/health-science/how-europes-climate-policies-have-led-to-more-trees-cut-down-in-the-us/2015/06/01/ab1a2d9e-060e-11e5-bc72-f3e16bf50bb6_story.html)

Partly owing to their inefficiency, biopower plants require gigantic infusions of cash in order to be financially viable. They receive taxpayer and ratepayer subsidies<sup>12</sup> in the form of Renewable Energy Credits, investment and production tax credits, and loan guarantees, which cost the public billions of dollars on top of payments for the electricity itself. In addition, nearly every country subsidizes<sup>13</sup> the timber industry—which provides the fuel—through similar giveaways. Citizens also pick up the tab for the damage caused by floods, droughts, tornadoes, hurricanes, and other severe weather events that are exacerbated by climate change.

Government policies designed to help industry at the expense of people and the environment are wrecking the climate. Bioenergy is so inefficient and expensive that it cannot function without subsidies from ratepayers and taxpayers. Therefore, one way to significantly help the climate is to end this corporate welfare. This would spur clean energy innovation and competition—because energy conservation and efficiency and solar and other non-combustion technologies would no longer be financially disadvantaged.

It's time to say no to corporate welfare and yes to honest-to-God clean energy. To successfully address our self-inflicted climate crisis, we need to stop burning biomass for energy and begin preserving and restoring plants and soils.

The United Nations just released a report concluding that rapid decline of the natural world, in large part caused by tree cutting, is even more dire than climate change.<sup>14</sup> We need to stop the carnage. Forest protection is paramount. Furthermore, solutions to climate change are right under our noses in the form of preserving our forests (and coasts).<sup>15</sup>

You should not ignore the DOER-commissioned Manomet report that demonstrated burning wood for energy hurts the climate for decades. We need improvement immediately, not decades down the road.

Climate change is telling us to stop burning things and destroying life on Earth. DOER should be serving the public rather than special interests such as the timber and biomass industries and, in so doing, reject bioenergy schemes that harm citizens' health, finances, and environment.

Sincerely,

A handwritten signature in black ink that reads "Ellen Moyer". The signature is fluid and cursive, with the first name "Ellen" and last name "Moyer" clearly distinguishable.

Ellen Moyer, Ph.D., P.E.

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<sup>12</sup> <http://www.pfpi.net/wp-content/uploads/2011/06/BAP-Biomass-Projects-Report.pdf>

<sup>13</sup> <http://www.civilizationsfuture.com/bsundquist/df6.html>

<sup>14</sup> [https://www.huffpost.com/entry/nature-destruction-climate-change-world-biodiversity\\_n\\_5c49e78ce4b06ba6d3bb2d44](https://www.huffpost.com/entry/nature-destruction-climate-change-world-biodiversity_n_5c49e78ce4b06ba6d3bb2d44)

<sup>15</sup> <https://www.independent.co.uk/environment/forests-climate-change-co2-greenhouse-gases-trillion-trees-global-warming-a8782071.html?fbclid=IwAR3Ew7eI0j-TqoQwEnI8NOuzmbscfCOsYXrzwdHEoM8tvOG8gvtvQnwdurg>