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May 16, 2019

John Wassam
MA Department of Energy Resources

Dear Mr Wassam,

We are opposed to the changes to RPS Class I and RPS Class II regulations that will allow increases of and provide financial support for biomass wood burning in Massachusetts. The Paris Agreement calls for reducing greenhouse gas emissions and protecting forests as natural carbon sinks. Instead, DOER is proposing using MA's primary clean energy program to incentivize logging and removal of forests, and encourage inefficient biomass power plants that release more CO₂ per unit of energy than coal-fired and gas power plants. This proposal undermines MA's ability to reduce greenhouse gas emissions, as required by the Global Warming Solutions Act, and contradicts the public statements Governor Baker has made claiming to support the Paris Agreement.

These proposals would extend the timeframe for biomass facilities to show a net reduction in GHG emissions relative to fossil fueled plants from 20 years to 30 years – when climate scientists are warning us that to avoid catastrophic warming, we must cut GHG emissions in half in the next ten years and take CO₂ that's already been emitted out of the atmosphere – by restoring and expanding carbon sequestration in forests. DOER's proposal heads us in the wrong direction – it incentivizes logging and burning trees for energy, which will increase CO₂ emissions and decrease carbon sequestration.

Just like coal plants, biomass plants belch soot, smog, and other pollutants that threaten public health and the environment. Emissions from biomass power plants contribute to acute and chronic health problems including asthma, heart disease, diabetes, and cancer. Ratepayer subsidies should be used to support truly clean, renewable energy, not more pollution and increased carbon emissions.

Sincerely, Kate O'Connor & Frederick Spence, North Road, Westhampton, MA