



DELIVERED AT UMASS AMHERST HEARING

May 16, 2019

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

Re: Opposition to Proposed Changes to Renewable Portfolio Standard Regulations

Dear Mr. Wassam:

The Massachusetts PipeLine Awareness Network (MassPLAN) appreciates this opportunity to comment briefly regarding our opposition to the Department's scientifically unsound proposal to rewrite the woody biomass provisions in the Renewable Portfolio Standard.

MassPLAN formed five years ago as a coalition that fought the ultimately defeated Kinder Morgan pipeline that would have cut clear across the Berkshires and northern tier of Massachusetts, pumping fracked gas through our treasured public and private forestlands. MassPLAN's mission is to empower communities to oppose unneeded natural gas infrastructure and help shape a clean energy future for Massachusetts.

From our pipeline work we are very familiar with the fact that natural gas – methane – is a highly potent greenhouse gas.

Today I'd like to debunk another industry's myth about methane. There's a biomass industry talking point claiming that using waste wood as fuel results in lower greenhouse gas emissions than leaving it decompose because it will emit methane. This is a flawed argument not backed by science.

While *wetlands* can be significant methane sources due to their anaerobic conditions, those anaerobic conditions do not normally exist when a tree falls in the forest. Forestry activities primarily take place in upland areas, and there is no evidence that decomposing tree tops and branches from forestry cuttings are a significant source of methane production.

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Ironically, scientific studies that have looked at greenhouse gas emissions from the biomass industry indicate that the transport¹ and storage² of wood pellets and wood chips in large volumes are actually more likely to create the kind of anaerobic conditions that lead to the production and emission of methane than simply leaving felled tree tops in the forest.

The Baker administration's proposed rewrite of the RPS regulations embraces a variety of unscientific industry sleights of hand regarding greenhouse gas emissions accounting. Just as one example, while the harvesting and transport of wood chips, and manufacture of wood pellets, all involve the burning of fossil fuels, DOER proposes to no longer include those emissions in accounting for the greenhouse gas impacts from biomass energy.

Please listen to the climate scientists rather than people who are on the extractive industries' payrolls.

Please withdraw the proposed draft changes to the RPS regulations. We need instead to move towards non-emitting energy sources as quickly as possible. Thank you.

Sincerely,



Kathryn R. Eiseman, Director
Massachusetts PipeLine Awareness Network

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¹ Svedberg, U., et al. 2008. Hazardous off-gassing of carbon monoxide and oxygen depletion during ocean transportation of wood pellets. *Annals of Occupational Hygiene*, 52:259-266.

² Whittaker, C., et al. (2016). "Dry Matter Losses and Methane Emissions During Wood Chip Storage: the Impact on Full Life Cycle Greenhouse Gas Savings of Short Rotation Coppice Willow for Heat." BioEnergy Research 9(3): 820-835.