

## Wassam, John (ENE)

---

**From:** Paul Martin <info@email.actionnetwork.org>  
**Sent:** Thursday, May 6, 2021 9:00 AM  
**To:** DOER RPS (ENE)  
**Subject:** RPS Public Comment

CAUTION: This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

John Wassam,

Dear Commissioner Woodcock,

I am writing to comment on the proposed amendments to Massachusetts' Renewable Portfolio Standard (RPS) program pertaining to burning woody biomass.

First, I completely agree that biomass power plants should not be located in or near Environmental Justice communities. Please keep this amendment without change: "A Generation Unit using Eligible Biomass Woody Fuel or Manufactured Biomass Fuel that is either: (i) sited in an environmental justice population or (ii) sited within 5 miles of an environmental justice population, shall not qualify as an RPS Class I Renewable Generation Unit."

In addition to the environmental justice issue affecting communities that have long borne the worst of polluting industry, there is the issue of climate change that affects everyone. An industrial incinerator takes minutes to convert biomass into CO2 and ash but nature takes decades to re-grow trees. This disparity in processing time means that any biomass incineration is an addition to atmospheric CO2 for many many years. The Manomet Report projects that generating electricity from woody biomass could become carbon neutral after about 90 years of continuous operation provided that re-planting and growth of trees is faithfully done. We do not have 90 years to solve the problem, we have only 9 more years to achieve a 50% reduction in emissions and another 20 after that to get to net zero. Therefore woody biomass incineration cannot in any practical sense and legally should not qualify for RPS subsidy.

I am therefore concerned about your plans to only require new biomass power plants to meet a 60% efficiency requirement. Under the current RPS regulations, ALL biomass power plants must meet that requirement in order to qualify for renewable energy credits in Massachusetts. Your proposal to eliminate efficiency requirements for existing biomass plants would allow dozens of highly polluting and inefficient biomass plants in Maine and across the Northeast to qualify for ratepayer subsidies if they claim to burn “non forest derived residues.” Even if they can prove they are truly burning wood residues, rather than trees logged for fuel, these plants pump out large quantities of health-harming air pollution and greenhouse gas emissions that contribute to climate change.

DOER’s plan to use Massachusetts’ ratepayer funds to prop up failing out-of-state biomass power plants will do nothing to mitigate climate change, reduce harmful air pollution, or promote new sources of clean, renewable energy. This proposal is inconsistent with the state’s recent acknowledgement of the health impacts from biomass power plant emissions and is a major step backwards for a state that has been a national leader on climate issues.

I urge you to leave the existing biomass eligibility criteria in the RPS intact, while adding the proposed provision to protect environmental justice communities.

Thank you.

Paul M. Martin

Paul Martin

paulmmartin46@gmail.com

46 Oxford St

Springfield, Massachusetts 01108