

Wassam, John (ENE)

From: Robert Michael Pittsley <info@email.actionnetwork.org>
Sent: Wednesday, May 12, 2021 3:18 PM
To: DOER RPS (ENE)
Subject: RPS Public Comment

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John Wassam,

Dear Reader,

I am writing as a Graduate of Environmental Science in Higher Education, not only working in Public Health Research, but also as a 9-year New England Farmer, this year working as the Youth Coordinator at Eastie Farm in East Boston. I am writing today 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.”

I am however 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.

Burning tree scraps wreaks havoc on every trophic level in that ecosystem, and the health of that community, in particular young people. It is a true environmental injustice unrecognized and misappropriated by so many regardless of Age, Race, Economic/Social Status, Personal preference, To-Do List, or Political affiliation.

Those who promote burning wood as carbon neutral, when it is not are creating terrible incentives, allowing biomass energy plants to take credit for making the environment better when in reality they will actually be making it much worse, enabling the destruction of fragile ecological systems, in the name of fighting climate change. It is a devastating contribution to air pollution & it incrementally misleads our communities into poor health, as even more money is wasted in order to turn back the clock in terms of clean air policy in the developed world.

Fine Particulate Matter (PM 2.5) Fine Particulate Matter are tiny dust and soot particles, measured at less than 2.5 microns in diameter, that are small enough to be inhaled and trapped in the lungs. Inhaled particles are a concern because of their potential to cause cancer and other respiratory conditions. When wood is burned in the neighborhood, deposition of PM 2.5 greatly exceeds levels emitted by nearly every other heat source, as well as multiple diesel shipping trucks.

While reacting with other pollutants, Benzene (found in the chemical composition of wood smoke) forms together with other air pollutants at ground level, producing ground level ozone, where it enters the Stomata of crops, causing an oxidation effect on plant tissue. Not good for our trees, our green spaces, our farms.

In many locations, wood burning is the single largest source of hazardous particle pollution during winter, responsible for more particle pollution than vehicles AND industry. Majority hangs at ground level for up to ten days. Worse on cold winter days (when people tend to burn wood), weather conditions create temperature inversions that seal the lower atmosphere, trapping hazardous pollutants close to ground level. This blankets crops, soil, creates ground level ozone, & covers our neighbors houses. PM from wood burning is so small, they penetrate homes despite how well-insulated & weather-stripped. Studies show PM pollution

levels inside homes reach up to 70% the pollution levels outdoors. So keep in mind, if you can smell wood smoke you're breathing pollution that is hazardous, even if the smell is nostalgic and warm.

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.

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