

Wassam, John (ENE)

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To: DOER RPS (ENE)
Subject: RPS Public Comment

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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."

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.

In addition, I have the following comments:

1. The equation that argues for carbon neutrality of biomass heating and electrical energy production relies on the assumption that trees will be regrown on the land that is cleared of 'waste' wood. In fact:
 - a. Depending on estimates, adequate tree replacement, assuming it occurs, would require 30-50 or more years to achieve carbon neutrality. According to the IPCC estimate, we only have 12 years to cut our carbon production in half to keep global warming below 2 degrees C—a serious difference in time scale. Additionally, the changing climate will mean current standing trees as well as new growth will be less well adapted to their sites, less prolific, and less able to sequester carbon.
 - b. The wood cleared to increase clearance around electric lines and the wood cleared for building projects (which regulation change proponents would like to add to the list of acceptable biomass sources) will never regrow, the land being used for these other purposes.
 - c. It is highly questionable, given the economic equation that proposes the need for incentives to biomass producers, that these producers will carefully replant other land stripped of its "waste" wood.
2. Proponents of the regulation changes argue that the same amount of CO₂ will be produced by burning the wood or letting it rot.
 - a. This is incorrect. A good portion of the carbon sequestered in rotting wood on the forest floor is recycled in multiple, complex ways through the forest ecosystem and remains sequestered in other organisms.
 - b. This argument ignores the fact that combustion of the wood produces many other byproducts—fine particulates, NO and NO₂, for example—that pose severe health risks for vulnerable populations and are not produced through natural rotting processes. In addition to the clear evidence establishing a relationship between these combustion byproducts and asthma, consider the substantial body of epidemiological studies linking particulates to coronary disease.
 - c. Proponents arguments also ignore that combustion is quick, delivering an intense dose of CO₂ to the atmosphere, and producing only toxic waste, whereas natural decomposition is both gradual and essential to the health of a forest ecosystem.
3. It requires stringent policing to ensure that the production and harvesting of "waste" wood from our forests, roadsides, power line rights of way, etc. does not extend into harvesting of healthy trees from forests. Given budgetary shortfalls for many municipalities, it seems unlikely

that this policing can be provided, leading to inroads on existing forests and losses of carbon sequestration.

4. To incentivize clearing and transport of “waste” wood for biomass energy production creates perverse incentives to find more “waste” wood, creating pressure and incentives to designate more productive forest as “waste”, as in 3, above.

5. Massachusetts is at the forefront of clean energy production, with a robust sector installing various forms of solar and wind energy. With proper attention to avoidance of forest clearing for solar arrays and turbines, this sector produces truly clean or green energy, with none of the public health hazards noted above. Therefore, the DOER should direct incentive programs towards this sector and most definitely not reduce the SREC payback period.

6. Finally, the DOER should direct some incentives towards research and development of other uses for “waste” wood that do not involve combustion. Most obvious is the use of wood in fiber and flake board, which keeps the carbon from the original, component wood bound up in the new building products. One of the arguments in favor of the regulation change is the (short-lived) creation of jobs. Incentives directed towards developing these new industries would create more sustainable jobs while avoiding the negative effects on public health and climate change involved in wood combustion for energy.

There are thus two major reasons to reject the proposed changes in these regulations. The public health argument sees only further degradation to the air quality in our valley and, indeed, New England, if biomass energy production is allowed, much less incentivized. And the climate emergency faced by our region and the world will only be exacerbated by the excess CO₂ (given the unacceptably long time lag to achieve carbon neutrality) produced by biomass energy production. Thus, there is no rational argument for the regulatory changes that expand and incentivize biomass energy production.

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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