

Wassam, John (ENE)

From: Alisa Pearson <alisapearson@earthlink.net>
Sent: Wednesday, May 5, 2021 9:21 AM
To: DOER RPS (ENE)
Subject: RPS Public Comment

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John Wassam,

Dear Commissioner Woodcock,

We are at a moment where we have to reexamine what we think we know. I respect that this is one of the hardest things to do- especially if you are someone who has taken on responsibility, but I beg you to hear me out.

Only 5% of Americans are alert to the fact that we are in a climate emergency. I was shocked to learn that half of the greenhouse gases have been released since 1990. Biomass is a big contributor to our ailing seasons and resulting fires, droughts, storms and wild temperature events. This affects crops and drinking water, and of course all our safety.

The good news is that, if we pull back, we will see natural systems coming back into balance sooner than we had hoped.

You can read about it in the interview Michael E. Mann did with 60 Minutes, here's an excerpt:

"There has been "a dramatic change in [scientists'] understanding" of the climate system in recent years, Mann said. It's a change many journalists may be unaware of, he added, noting that the scientific community hasn't done a great job of explaining it. Humanity, it turns out, may have a bit more time to prevent climate breakdown than previously believed."

So there is urgency and hope as I write to you to implore you to use your significant influence to make a big difference.

I know this is just an email, but if being stuck home in COVID has shown me anything, it is that things are not normal, and it is up to us to be alert to any and all ways we can help. It will

make a huge difference to our ancestors. Every fraction of a degree heating prevented, prevents suffering.

We all may have never thought we would be the hinge generation, but we are. The consensus on this is as clear as it is on the presence of gravity: we can and must halt global heating.

Biomass is a huge contributor. The biomass industry is practically required to dispute the facts. I feel for the industry, but this is too important to ignore:

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.

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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