



May 10, 2021

Dear Commissioner Woodcock:

The Jewish Alliance for Law and Social Action (JALSA) is a membership-based non-profit organization based in Boston, with many hundreds of members and supporters statewide. Inspired by Jewish teachings and values, we are devoted to the defense of civil rights, the preservation of constitutional liberties, and the passionate pursuit of social, economic, racial, and environmental justice for all.

JALSA wishes to offer its comments on the biomass-related changes contained in the Phase 2 Renewable Portfolio Standard (RPS) Class I regulations, which amend 225 CMR 14.00. JALSA supports the proposed environmental justice protections, but opposes the proposed changes allowing non-forest-derived biomass to qualify for the RPS program.

JALSA welcomes changes contained in the proposed 225 CMR 14.05(1)(a)(7)(f), which would bar biomass facilities from qualifying for the RPS if they are located in, or within five miles of, an environmental justice population. JALSA and its members fundamentally believe that biomass energy is dirty energy, and that no one should have to inhale the harmful particles and gases that biomass facilities emit—particularly not those whose lives and health have been most affected by patterns of environmental racism. Facilities such as the Palmer biomass plant have the potential to entrench, rather than reverse, patterns of environmental injustice. While much remains to be done to promote true environmental justice, this change is an important step in the right direction.

The second major proposed change, which would allow non-forest-derived biomass to qualify for the RPS for the first time since 2012, is a step back. This change would allow Massachusetts ratepayers to subsidize existing woody biomass plants across the Northeast. These woody biomass plants could incinerate tree trimmings, mill waste, or, in some cases, whole trees, while forcing local populations to live with the hazardous emissions, air pollution, and greenhouse gases that result from burning wood. The Renewable Portfolio Standard should be used for truly clean, renewable energy—not false solutions like woody biomass.

Sincerely,

A handwritten signature in blue ink that reads "Cindy Rowe".

Cindy Rowe  
Executive Director  
Jewish Alliance for Law and Social Action