

Wassam, John (ENE)

From: Cynthia Sommer <casom@comcast.net>
Sent: Sunday, May 9, 2021 7:06 PM
To: DOER RPS (ENE)
Subject: RPS Public Comment

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John Wassam,

Dear Commissioner Woodcock,

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

In order to protect the public health, biomass power plants should not be located in or near Environmental Justice communities. My husband is a physician at the Mason Square Neighborhood Health Center, located in a low-income community in Springfield. He has many patients with asthma and other respiratory diseases who would have become much sicker if the proposed biomass plant had been built. Please keep the amendment as is: "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 also in favor of keeping the current RPS regulations, which require all biomass power plants to meet a 60% efficiency requirement in order to qualify for renewable energy credits in Massachusetts. The proposal to eliminate efficiency requirements for existing biomass plants would allow polluting and inefficient biomass plants from states in the Northeast to qualify for ratepayer subsidies if they burn "non-forest derived residues." In the South, several biomass plants that supposedly burn wood byproducts are actually burning logged trees.

A new Harvard study (5/5/2021) shows that negative impacts of burning natural gas and biomass have surpassed coal generation in many states. Here is a link to the study:
<https://iopscience.iop.org/article/10.1088/1748-9326/abe74c> Not only would incentivizing

biomass be bad for the Commonwealth's health policy; it would also make it harder to reach our climate change goals.

I urge you keep the existing biomass eligibility criteria in the RPS and add the proposed provision to protect environmental justice communities.

Thank you.

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