

Mr. John Wassam

June 11, 2010

Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA

Re: proposed RPS and APS regulation changes

Dear Mr. Wassam

Thanks to the DOER for conducting the series of public hearings regarding proposed changes to the RPS and APS regulations. Several members of the Climate Action Group (CAG) of the Unitarian Society of Northampton and Florence attended the Springfield hearings on 6/5 and found the wide range of opinions interesting and helpful.

Speakers who favor the regulation changes are seeking ways to manage 'waste' wood, wood that is currently being cut down or stored due to weather, disease, roadway projects, forestry management, and other projects. Also, there is an understandable concern about employment for skilled and less-skilled workers.

Speakers opposing the proposed regulation, many of them residents of Springfield, have strong concerns about biomass incineration increasing rates of asthma and other negative health outcomes (already high in the area), as well as a CO₂ production greater than that of burning coal, thus contributing to climate change. Unfortunately, the forum structure did not permit or encourage dialogue about these differences in perspective.

Reflecting on these differences, the Climate Action Group argues strongly against the proposed regulatory changes for reasons of both climate change mitigation and public health. We wish to add the following points for DOER consideration:

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. This is correct, but it 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. 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.

- a. 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.

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