

## Comments on Proposed Changes to the Biomass Regulations in the Renewable Energy Portfolio Standard (225 CMR 14.00 and 225 CMR 15.00)

I am writing to oppose the proposed changes for the following reasons:

- The urgency around the climate crisis demands that all policy changes have as a foundation goal the reduction of greenhouse gases (GHGs).
- We have 10 years to make significant changes to our emissions and the proposed regulations supporting an increased biomass industry will promote potentially significant increases in GHGs.
- I agree with the comment made at the Springfield meeting that “clean emissions do not come from a stack.”
- More than a decade ago a compromise was reached with respect to biomass. Current regulations were constructed after a commissioned study and much public conversation limiting subsidized biomass to small high-efficiency facilities.
- DOER has a responsibility to judiciously spend electric rate payers money collected for the purpose of supporting renewable energy sources.
- Burning wood is dirty and polluting and should not qualify for these funds. Large biomass facilities typically are only 25% efficient – and that mean an incomplete burn resulting in unwanted emissions. The biomass industry is not financially viable and can only exist with subsidies. Only biomass business owners benefit from these facilities; the local people suffer.
- I disagree with the speaker at the Springfield meeting who claimed the alternative to using ancient fossil-fuel carbon is using biogenic carbon. This is a false dichotomy. There are truly clean alternatives such as wind and solar.
- The argument that woodchips left to compost also emit carbon so we might as well burn them and capture the energy is also flawed. Woodchips left to compost still sequester the carbon for years if not decades and some of the carbon get incorporated into the soil by soil organisms. This is contrast to the immediate release of the sequestered carbon along with all the fossil-fuels spent collecting, transporting and drying the woodchips to ready them for burning.

In conclusion, do not make it more profitable to cut down our most efficient carbon sinks. Trees left to grow are a significant solution to our climate crisis.

Respectfully submitted,

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