

July 22, 2019

John Wassam

Department of Energy resources

Subject: Proposed Changes to the Renewable Energy Portfolio and Alternative Energy Standards

I am writing to request that DOER reconsider changing the RPS and APS to include biomass which, because of the length of time it takes for a tree to grow compared to the instant release of carbon dioxide on ignition, cannot logically be considered a renewable resource.

Furthermore, the changes include reduced emission standards. Large scale biomass-to-energy plants would pose an added risk for asthma sufferers. Granting RECs for biomass to energy would provide an economic incentive for the destruction of forests with consequent loss of carbon sequestering capacity. Recent research indicates that intact forests sequester more carbon than "managed" or young, post-harvest forests. Further, forests will be relied upon in the future to help draw down carbon dioxide levels even under an eventual zero carbon emissions scenario.

The intact, contiguous forests in Western Mass. and other areas provide clean air, water, habitat, and recreation, "ecosystem services" that benefit the rest of the State. I fear that loosening standards will be detrimental to public health, as well as to efforts to mitigate climate change.

Sincerely,

John Nelson Jr.

Plainfield Conservation Commission

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