



## SUPPORT S.2197/H.3333

### *An Act to Prevent Biomass Energy to Protect the Air We Breathe*

Sen. Lesser (First Hampden/Hampshire), Rep. Livingstone (Boston), Rep. Ramos (Chicopee/Springfield)

**BILL PURPOSE:** S.2197/H.3333 removes woody biomass as an eligible fuel source in Massachusetts' Renewable Energy Portfolio Standard (RPS) and Alternative Energy Portfolio Standard (APS).

**THE ISSUE:** Subsidizing woody biomass energy through Massachusetts' clean energy programs undermines the Commonwealth's climate and environmental justice goals. Burning wood for heat and power emits more carbon dioxide per unit of energy than coal and can increase greenhouse gas impacts for decades to centuries compared with fossil fuels. Biomass power plants and heating systems are also a significant source of fine particulate matter and other harmful air pollutants, even when using state of the art emission controls. Low-income communities, communities of color, and sensitive populations such as children, the elderly, and people with respiratory ailments are especially at risk. Recent studies have shown a correlation between exposure to elevated levels of particulate matter and increased severity of disease and/or mortality for COVID-19 patients. Massachusetts should eliminate wasteful subsidies for woody biomass energy and focus on real climate solutions.

**BACKGROUND:** The Commonwealth has established ambitious goals to reduce greenhouse gas emissions under the 2008 *Global Warming Solutions Act* and the *Next Generation Climate Roadmap* law enacted this year. Massachusetts has been a national leader in developing innovative programs to achieve these climate goals.

Massachusetts' RPS and APS programs are both intended to reduce greenhouse gas emissions and move the state away from burning fossil fuels. The RPS requires electric utilities to obtain a percentage of the electricity they supply from qualifying renewable energy facilities. Similarly, the APS provides requirements and incentives for alternative energy sources that are energy efficient, including renewable heating technologies. Eligible power generators rely on these guaranteed annual revenues, subsidized by Massachusetts ratepayers, to finance, construct, and operate their facilities.

Currently, Massachusetts has the most stringent, science-based RPS standards in the nation for wood-burning power plants. Only a handful of small, highly efficient combined heat and power (CHP) biomass plants presently qualify, with a combined capacity of less than 2 MW.

However, the Baker Administration has systematically worked to expand the biomass industry's access to Massachusetts' lucrative ratepayer subsidies. In 2017, despite the strict limitations on eligible wood heating systems spelled out in the APS statute (MGL Ch. 25A, § 11F1/2), the MA Department of Energy Resources (DOER) adopted weak emissions standards and forest protection guidelines for qualifying biomass heating systems in the APS. In 2019, DOER proposed weakening the RPS regulations to match the APS regulations, calling it "regulatory streamlining." In April, after a public outcry over how these

changes would provide more than \$10 million a year in ratepayer subsidies to the proposed Palmer Renewable Energy biomass power plant in Springfield, impacting the health of surrounding environmental justice communities, DOER amended its proposal to maintain the existing standards for new biomass power plants and added a significant new provision prohibiting biomass plants sited in or near environmental justice communities from qualifying for the RPS.<sup>1</sup>

Nevertheless, DOER is still proposing sweeping changes to the RPS that would allow dozens of older polluting biomass plants across the Northeast to qualify, fundamentally undermining Massachusetts' climate, clean energy, and sustainable forestry goals. In a letter to the TUE Committee last December, the Attorney General's office warned:

*"Policies that subsidize wood burning, like the revised RPS eligibility requirements for biomass set forth in DOER's Draft Regulations, move the Commonwealth in the wrong direction. Our forests are one of our first lines of defense against climate change because of their ability to sequester carbon. Yet DOER's new regulations threaten their integrity and will result in increased greenhouse gas emissions almost certainly in the short term—when we need to be drastically reducing emissions—and most likely over the longer term, notwithstanding the flawed analyses accompanying DOER's Draft Regulations."*<sup>2</sup>

**WHY THIS LEGISLATION IS NEEDED:** Climate scientists agree that we need to take urgent action in the coming decade to both reduce greenhouse gas emissions and protect and restore forests as natural carbon sinks to draw down and sequester atmospheric carbon. PFPI's research shows that even when only wood residues are burned (as opposed to whole trees logged for fuel), woody biomass energy is a net source of carbon for decades – well past the timeframe for meaningful climate action.

Furthermore, new information continues to emerge regarding the health impacts of fine particulate matter emissions (PM<sub>2.5</sub>), the leading cause of air pollution-related illness and death in the U.S. MassDEP cited multiple studies on the disproportionate air pollution and health impacts on environmental justice communities when it issued a letter revoking the operating permit for the Springfield biomass plant.<sup>3</sup> According to 2014 EPA emissions data, Massachusetts has the highest levels of particulate pollution in New England, with a quarter of the state's total PM<sub>2.5</sub> emissions coming from residential, commercial and industrial wood heating.<sup>4</sup> It makes no sense, from a climate or a public health perspective, to use the state's clean energy incentives to subsidize wood burning for heat or energy.

**PFPI urges you to support and co-sponsor S.2197/H.3333, *An act to prevent biomass energy to protect the air we breathe.***

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<sup>1</sup> See DOER's proposed Phase 2 RPS changes, 4/16/21, <https://www.mass.gov/service-details/rps-class-i-ii-rulemaking>

<sup>2</sup> Booth, M. S. (2018). "Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy." *Environmental Research Letters* 13(3): 035001. At <http://iopscience.iop.org/article/10.1088/1748->

<sup>3</sup> Letter from Michael Gorski, MassDEP to Vic Gatto, Palmer Renewable Energy, dated April 2, 2021. Posted at <http://www.pfpi.net/wp-content/uploads/2021/04/Palmer-Renewables-Revocation-Final-1.pdf>

<sup>4</sup> <http://www.pfpi.net/massachusetts-tops-northeast-in-air-pollution-from-wood-burning>