

June 7, 2023

Hon. Michael Barrett
Co-Chair, Joint Committee on
Telecommunications, Utilities & Energy
Massachusetts Senate

Hon. Jeffrey Roy
Co-Chair, Joint Committee on
Telecommunications, Utilities & Energy
Massachusetts House

Re: End Massachusetts subsidies for woody biomass energy

Dear Senator Barrett, Representative Roy, and Members of the Joint Committee on
Telecommunications, Utilities & Energy:

On behalf of the undersigned local, state, and regional organizations, we write, first, to thank you for your successful efforts last year in preventing new subsidies for wood burning power plants when faced with a regulatory assault on our state's signature clean energy program, the Renewable Portfolio Standard (RPS). We are grateful that you took the time to understand the science and take action last session.

As the body of scientific evidence on the polluting effects of wood burning continues to grow, we respectfully request that the Joint Committee on Telecommunications, Utilities & Energy issue an "ought to pass" recommendation for two new bills that would bring other clean energy programs in line with the modernized RPS by removing woody biomass as an eligible fuel source: **S.2136 /H.3210** (Gomez, Ramos, et al., *An Act to remove woody biomass from the greenhouse gas emissions standard for municipal lighting plants*) and **S.2137/H.3211** (Gomez, Ramos, et al., *An Act limiting the eligibility of woody biomass as an alternative energy supply*).

S.2136/H.3210 would remove woody biomass from the list of "non-carbon emitting sources" that municipal lighting plants (MLPs) can use to meet the new MLP greenhouse gas emission standard (GGES). The new MLP standard, which was created as part of the 2021 Roadmap Law, places important clean energy requirements on MLPs, which are currently exempt from the Massachusetts RPS and other clean energy requirements. However, under that law, biomass is set to be included in the list of "non-carbon emitting sources" effective January 1, 2026.

S.2136/H.3210 would remove biomass from the GGES altogether, to be consistent with the General Court's evolved understanding that incentivizing wood burning for power makes it harder for the Commonwealth to achieve our climate mandates. Biomass is, of course, not a "non-carbon emitting source" by any reality-based definition; burning wood releases more carbon into the air than the dirtiest fossil fuels.¹ Moreover, lifecycle analyses show that even when wood "residues" are burned (as opposed to trees logged for fuel), wood heating is a net

¹ Walker, T. *et al.*, Manomet Center for Conservation Sciences. *Biomass Sustainability and Carbon Policy Study* (June 2010). Prepared for the Massachusetts Department of Energy Resources, <https://www.mass.gov/files/documents/2016/08/qx/manomet-biomass-report-full-hirez.pdf>.

source of carbon emissions in the atmosphere for decades – well past the timeframe for meaningful climate action.²

S.2137/H.3211 would make large and intermediate-sized heating units that use wood-based fuel (such as wood boilers and furnaces) ineligible for subsidies through Massachusetts' Alternative Energy Portfolio Standard (APS). The APS regulations that Governor Baker's administration adopted in 2017 include weak emissions standards and forest protection guidelines for qualifying biomass heating systems. With this change, the APS "renewable thermal" subsidy will help incentivize truly clean technologies – such as heat pumps, solar hot water, and geothermal systems – without incentivizing more commercial-scaled wood burning facilities. (Units defined by regulation as "small" and all units that are already participating in the APS program would not be affected by the bill as filed.)

Troubling information continues to emerge regarding the health impacts of fine particulate matter emissions (PM_{2.5}), the leading cause of air pollution-related illness and death in the United States. Many health experts believe that there is no safe level of exposure to PM_{2.5} emissions below which negative health effects aren't seen.³ Wood-burning boilers and furnaces emit a disproportionately large amount of air pollution in Massachusetts. **According to the most recent EPA emissions data, residential and commercial wood heating accounted for 83% of all fine particulate (PM_{2.5}) emissions from Massachusetts' heating sector, and 22% of the state's total PM_{2.5} emissions.**⁴ These figures are all the more alarming given that DOER estimates that fewer than 2% of Massachusetts homes are heated with wood.⁵

Massachusetts ratepayers have already spent millions of dollars to promote wood-burning technologies through the APS.⁶ Including wood in the MLP GGES would funnel even more money to a polluting industry by subsidizing utility-scale economically unviable wood-burning

² Laganier, J., et al. *Range and Uncertainties...*, Feb 2017 (available <https://onlinelibrary.wiley.com/doi/epdf/10.1111/gcbb.12327>); Booth, M.S., *Not Carbon Neutral...*, Feb. 2018 (available at <https://iopscience.iop.org/article/10.1088/1748-9326/aaac88>).

³ Marks, G, *Misuse of Pollution Reference Standards: No Safe Level of Air Pollution*, American Journal of Respiratory and Critical Care Medicine, May 1, 2022. (Available at <https://www.atsjournals.org/doi/full/10.1164/rccm.202201-0160ED>).

⁴ See <https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-data>.

⁵ See <https://www.mass.gov/service-details/how-massachusetts-households-heat-their-homes>.

⁶ See PFPI, [Financial Considerations for H. 853](#), 5/5/19, pp. 2-4.

power plants throughout New England⁷—plants whose smokestack CO₂ emissions are worse than coal per unit of energy generated.⁸

These ratepayer-funded programs are best used to incentivize clean, non-emitting energy technologies, such as wind, solar, and heat pumps. not wood-burning technologies, which cause harmful air pollution while exacerbating climate change. Please report S.2136 /H.3210 and S.2137/H.3211 out favorably. 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.

Sincerely,

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⁷ Booth, M. S. (2017). Maine Bioenergy at the Crossroads: Costs of a Failing Industry. Pelham, MA, Partnership for Policy Integrity (available at <http://www.pfpi.net/wp-content/uploads/2017/04/PFPI-Maine-Biomass-Report-4-18-17.pdf>).

⁸ See for instance PFPI, [FAQs on the Proposed PRE Power Plant in Springfield and DOER’s Plans to Weaken Biomass Standards in the RPS](#), 5/29/19. (Note that while the new RPS regulations include a carveout to prevent Class 1 RPS subsidies for power plants in environmental justice communities such as Springfield, there are no such protections in the APS or Class 2 RPS regulations.)

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