

September 25, 2020

Chairman Thomas Golden
State House, Room 473B
Boston, MA, 02133

Chairman Mike Barrett
State House, Room 109-D
Boston, MA, 02133

Representative Patricia Haddad
State House Room 370
Boston, MA, 02133

Senator Cynthia Creem
State House, Room 312-A
Boston, MA, 02133

Representative Bradley Jones
State House, Room 124
Boston, MA, 02133

Senator Patrick O'Connor
State House, Room 419
Boston, MA, 02133

RE: Biomass Energy and Environmental Justice Concerns in H.4933/S.2500

Dear Chairman Barrett, Chairman Golden, and Honorable Members of the Climate Conference Committee:

We, the undersigned organizations, who work on public health, environmental justice, clean and affordable energy, climate change, and environmental protection in Massachusetts, are writing to express our concerns about a provision in the House 2050 Roadmap bill that would seriously undermine the success of this climate legislation, and must be amended or removed.

Specifically, Section 15 of [H.4933](#) creates a new greenhouse gas (GHG) emission standard for municipal light plants (MLPs) that would require MLPs to purchase increasing quantities of energy from “non-carbon emitting” sources. However, the House bill defines “non-carbon emitting” energy too broadly and includes a number of energy sources that emit carbon when combusted, including biomass power plants. Calling biomass energy “non-carbon emitting” is flawed for multiple reasons:

1) It's scientifically wrong. Biomass power plants are major sources of carbon dioxide emissions. Wood-burning power plants emit 50% more carbon dioxide from their smokestacks than coal plants, for the same amount of electricity generated, along with large quantities of co-pollutants.

2) It conflicts with state policy. Under Massachusetts' Clean Energy Standard, only hydro, nuclear, ocean, solar and wind power are defined as “non-emitting electricity generators.” (310 CMR 7.75(2))

3) It undermines years of science-based policy-making in our Commonwealth. Massachusetts uses stringent, science-based criteria for determining whether biomass power plants can qualify for the state's Renewable Portfolio Standard (RPS) that were developed through an extensive rulemaking process. The Alternate Portfolio Standard statute for renewable heating technologies also contains strict criteria for inclusion of woody biomass.

4) It creates a new incentive for biomass plants that are too polluting to qualify for renewable energy credits under Massachusetts' current RPS rules, thus undermining the Commonwealth's climate goals. The House bill would allow any biomass power plant to qualify for the new MLP standard, no matter what type of fuel it burns or how polluting and inefficient.

In addition to the climate impacts, we are extremely concerned about the environmental justice impacts of this proposal. This legislation would pave the way for the construction of a 42-megawatt wood-burning power plant in an environmental justice community in East Springfield. The proposed Palmer project would be the largest biomass plant in Massachusetts, but it has not been able to secure financing primarily because it is too polluting to qualify for Massachusetts' renewable energy subsidies. If the language in [H.4933](#) Section 15 calling biomass "non-carbon emitting energy" is not removed, it will provide a clear incentive for municipalities to purchase power from Palmer biomass, potentially providing the green light for Palmer to receive the financing it needs to begin construction.

Springfield residents are already suffering disproportionately from air pollution and inadequate access to health care, two risk factors that have been linked to increased risk of Covid-19 fatalities. For the past two years, Springfield has been named the "Asthma Capital of the USA," based on sky-rocketing asthma rates, emergency room visits, and asthma-related deaths, and the American Lung Association has given Springfield failing grades for its air quality. If built, the Palmer biomass plant would worsen an already dire situation by emitting more than 200 tons per year of fine particulates, nitrogen oxides, sulfur dioxide, heavy metals, carcinogens, and other harmful air pollutants out its smokestack, plus additional air pollution from truckloads of wood delivered to the facility and dust from wood fuel and ash stored on site.

We stand in solidarity with Springfield residents and environmental justice groups who have been fighting the proposed Palmer biomass plant for more than a decade. Springfield already has more than its fair share of polluting facilities and should not become a "sacrifice zone" to produce dirty power that will be sold to municipalities elsewhere in the state as part of a new MLP greenhouse gas standard.

Our groups support either of the following options in the final negotiated climate package:

- 1) Remove the definition of "non-carbon emitting sources" and require that only resources that are qualified under MA's RPS or meet the definition of "non-emitting sources" in MA's Clean Energy Standard can be eligible for the MLP greenhouse gas emission standard; or,
- 2) Remove the MLP greenhouse gas emission standard entirely.

Thank you for your leadership on climate change and prioritizing clean energy this session with the passage of S.2500 and H.4933. We urge the conference committee to advance just and equitable climate solutions that support the Global Warming Solution Act's goal of reducing greenhouse gas emissions 80% by 2050 while protecting public health, and not adding more pollution in communities that are already overburdened.

Thank you very much for your consideration of our concerns.

Sincerely,

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