

## **OVERVIEW OF PROPOSED RPS CHANGES REGARDING BIOMASS 5/10/19**

(for copy of full draft commentary please email [mbooth@pfpi.net](mailto:mbooth@pfpi.net))

### **Key Takeaway: The betrayal of the 2012 compromise on bioenergy, forests, and climate**

Proposed changes would roll back every meaningful protection in the MA biomass rules  
Will allow the Palmer Renewable Energy plant (35 MW electricity-only) to be built in Springfield  
Financial support for a polluting industry, when we should be focusing on non-emitting power  
DOER's "wood availability" study cedes the forest carbon sink to biomass developers  
The biomass regulations **should be strengthened to reflect climate urgency, not weakened**

### **Current state of MA bioenergy, forests, and climate science**

Climate scientists say we need to cut emissions in half in the next ten years  
Biomass power plants emit more CO<sub>2</sub> pollution than coal or gas plants; the impact lasts decades  
Massachusetts biomass rules lead the nation and the world; DOER wants to roll them back  
MA and New England are already falling short of our emission reduction goals  
Renewable energy in MA and New England is dominated by wood and garbage-burning

### **DOER's proposal will increase CO<sub>2</sub> emissions from wood-burning power plants**

Eliminates definition and reporting of lifecycle GHG emissions  
Changes timeframe for bioenergy GHG "benefit" from 20 years to 30 years (should be 10 or less!)  
Reduces plant efficiency requirement for plants burning forest residues and thinnings  
*Eliminates* efficiency requirement for "salvage" wood and non-forest residues  
Counts fuel-drying as "useful" energy, thereby increasing net CO<sub>2</sub> emissions  
Allows "offsetting" of emissions violations from year to year

### **Proposal will increase air pollution from bioenergy**

Eliminates requirement that plants demonstrate they can meet emissions criteria

### **Proposal increases wood treated falsely as having "low" or "zero" emissions**

Over-represents benefits of forestry residues, then broadly classifies fuels as residues  
Defines trees damaged during logging operations, trees harvested for restoration as "residues"  
Defines more trees as "thinnings"  
Massively increases amount of wood classified as "salvage"  
Expands definition of mill residues  
Post-consumer wood & agricultural wood waste: Classified as non-forestry residues with minimal carbon impact  
Retains classification of trees cut for agriculture as non-forest residues  
Abolishes definition of energy crops

### **Proposal would increase emissions from liquid/gaseous biofuels**

Adopts carbon accounting that treats all biomass as having zero carbon emissions

### **Reduces accountability, transparency, & citizen oversight of GHG accounting**

### **Reduces and eliminates protections for forests adopted in the 2012 rules**

### **Replaces real metrics with bogus "Sustainable Forestry" provisions**