

## **Arise for Social Justice - Springfield Climate Justice Coalition - Partnership for Policy Integrity**

December 11, 2019

Hon. Richard E. Neal  
Chairman, Ways and Means Committee  
U.S. House of Representatives  
300 State Street, Suite 200  
Springfield, MA 01105

Re: Remove biomass incentives from the GREEN Act

Dear Congressman Neal:

Our organizations urge you to remove the tax incentives for biomass energy from the GREEN Act “discussion document” that the House Ways and Means Committee released last month. While the goals of the GREEN Act are worthy, it contains several provisions that extend existing tax credits or create new ones for biomass energy that will result in increased air pollution and greenhouse gas emissions.

We are particularly concerned about the proposal to revive the production tax credit (PTC) for electricity from burning biomass or municipal solid waste and extend it through the end of 2024 (Section 101). This provision would have direct and harmful consequences to the citizens of Springfield, where the largest biomass power plant in Massachusetts has been proposed.

In addition, the GREEN Act creates new renewable energy tax incentives for biomass gasification (Section 102) and for residential wood stoves (Section 302), which already contribute significantly to Massachusetts’ poor air quality. In 2014, Massachusetts had the highest levels of particulate pollution from residential wood burning among the New England states, and Worcester County had the eighth highest levels among counties nationwide.<sup>1</sup> Supporting such polluting activities with public dollars undermines important health and environmental goals.

### **Local Health Impacts in Springfield**

For more than a decade, Springfield residents have been fighting a massive wood-burning power plant proposed at the Palmer Paving site in East Springfield, located in a low-income environmental justice community that already has unhealthy air quality. Despite collective efforts to address these serious air pollution issues, Springfield has been named “Asthma Capital

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<sup>1</sup>See PFPI analysis of data from the EPA’s National Emissions Inventory for 2014 at <https://www.pfpi.net/massachusetts-tops-northeast-in-air-pollution-from-wood-burning>, August 1, 2017.

of the US” for the past two years by the Asthma and Allergy Foundation of America based on asthma prevalence, emergency room visits, and asthma-related deaths.<sup>2</sup>

Palmer Renewable Energy is promoting this project as clean, green, renewable energy but there is nothing “clean” or “green” about burning wood for energy. The proposed PRE plant would emit hundreds of tons of air pollutants that are harmful to human health each year, including fine particulates (PM 2.5), which lodge deep in the lungs when inhaled; nitrogen oxides, sulfur dioxide, and volatile organic chemicals, which are smog precursors; and hazardous air pollutants (HAPs), including mercury, lead, arsenic, dioxin, and hydrochloric acid (see Table 1).<sup>3</sup> In addition to the stack emissions, there will be noise, dust, and more pollution from the trucks hauling tons of woodchips to be burned and ash out to be disposed. The stoker boiler will burn up to 432,160 tons of wood fuel per year, consisting of primarily of green wood chips, and emit an estimated 434,737 tons per year of carbon dioxide emissions.

**Table 1**  
**Proposed Annual Potential Emission Rates (Tons Per Year)**

<b>Pollutant</b>	<b>Boiler</b>	<b>Lime Storage Silo</b>	<b>Ash Storage Silo</b>	<b>Wood Storage Shed</b>	<b>Fugitive Emissions</b>	<b>Facility Wide</b>
NO <sub>x</sub>	37.9	-	-	-	-	37.9
CO	81.4	-	-	-	-	81.4
VOC	11.15	-	-	-	-	11.15
SO <sub>2</sub>	26.8	-	-	-	-	26.8
PM <sup>1</sup>	33.44	0.008	0.231	0.41	0.46	34.55
PM <sub>10</sub> <sup>2</sup>	33.44	0.008	0.231	0.17	0.092	33.94
PM <sub>2.5</sub> <sup>3</sup>	33.44	0.002	0.053	0.02	0.023	33.54
HAPs	13.2	-	0.0012	-	-	13.2
NH <sub>3</sub>	13.4	-	-	-	-	13.4

<sup>1</sup> PM consists of all filterable and condensable PM including PM<sub>10</sub> and PM<sub>2.5</sub>.

<sup>2</sup> PM<sub>10</sub> consists of filterable and condensable PM with an aerodynamic diameter equal to or less than 10 microns.

<sup>3</sup> PM<sub>2.5</sub> consists of filterable and condensable PM with an aerodynamic diameter equal to or less than 2.5 microns.

After years of inactivity, Palmer is now actively seeking financing to construct this facility. In June, hundreds of Springfield residents crowded a hearing conducted by the Massachusetts Department of Energy Resources (DOER), which has proposed to weaken MA’s RPS standards in order for polluting biomass plants like PRE to be eligible for subsidies at the state level. Extending the PTC for biomass would add to the likelihood that the Palmer biomass plant will be built, worsening air quality and further harming the health of Springfield residents.

<sup>2</sup> Asthma and Allergy Foundation of America, Asthma Capitals: The Most Challenging Places to Live With Asthma (2018; 2019) <https://www.aafa.org/media/2426/aafa-2019-asthma-capitals-report.pdf>; <https://www.aafa.org/media/2119/aafa-2018-asthma-capitals-report.pdf>.

<sup>3</sup> MA Department of Environmental Protection, June 30, 2011. Conditional Approval for the proposal by Palmer Renewable Energy LLC to construct a biomass-fired power plant at 1000 Page Boulevard in Springfield, MA, p. 15.

## Impacts on the Climate and MA's Emissions Reduction Goals

For many years, national environmental groups have objected to federal biomass subsidies for biomass energy. This opposition is evidenced by a [letter from October 2013](#) signed by 14 organizations, including the Partnership for Policy Integrity which is based in Massachusetts, calling on Congress to end federal tax subsidies for biomass. The case that we articulated in that letter is even more dire now, as we cannot afford to promote energy that increases carbon emissions in the short time frames that are crucial to addressing climate change:

- The scientific evidence is clear that wood-fired power plants are neither “clean” nor carbon neutral within timeframes relevant to tackle the worst effects of climate change;
- At the smokestack, biomass powered plants emit far more CO<sub>2</sub> per megawatt-hour of electricity than fossil-fueled plants;
- Burning wood emits conventional air pollutants at levels comparable to fossil fuels that harm public health, including particulate matter and nitrogen oxides.

The evidence continues to be clear: expansion of burning wood for energy threatens our forests, our climate and the health of our communities. Facing a climate crisis that demands immediate and effective greenhouse gas emissions reductions, we cannot afford to be spending scarce public dollars on energy sources that exacerbate the problem.

A study commissioned by the State of Massachusetts under the Patrick Administration determined that burning forest wood for electricity would impede Massachusetts' ability to meet the greenhouse gas emissions reduction goals set forth in the state's landmark 2008 Global Warming Solutions Act (GWSA).<sup>4</sup> The state accordingly ended subsidies for biomass electricity. Expanding renewable energy subsidies for biomass energy at the federal level would undercut the progress the state has made on this issue.

Moreover, since Massachusetts enacted the GWSA, overwhelming scientific consensus tells us that we must do more. The GWSA's 80% emissions reduction goal falls short of what the latest IPCC report says is required by 2050—economy-wide carbon neutrality, where emissions are balanced by uptake. Growing trees – not burning them – is our best option for drawing down and sequestering carbon from the atmosphere.<sup>5</sup>

For all the above reasons, we urge you to remove the provisions in the GREEN Act that extend the existing PTC for biomass energy and garbage incineration and add new forms of subsidies for the biomass industry. We also urge you to oppose including any incentives for biomass energy in the 2020 federal budget, such as a budget rider in the Senate's Interior and Appropriations budget (S.2580, Section 427) that falsely declares forest biomass energy “carbon

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<sup>4</sup> Walker, T., et al. (2013). "Carbon Accounting for Woody Biomass from Massachusetts (USA) Managed Forests: A Framework for Determining the Temporal Impacts of Wood Biomass Energy on Atmospheric Greenhouse Gas Levels." *Journal of Sustainable Forestry* 32(1-2): 130-158.

<sup>5</sup> See Dr. Mary Booth, PFPI, Oct. 7, 2018. “The IPCC's Recipe for a Livable Planet: Grow Trees, Don't Burn Them,” at <https://www.pfpi.net/the-ipccs-recipe-for-a-livable-planet-grow-trees-dont-burn-them>.

neutral” (see 12/2/19 letter from MA environmental groups, attached). We would be happy to meet with you or your staff to provide additional information. Thank you.

Sincerely,

Tanisha Arena  
Director, Arise for Social Justice  
Springfield, MA

Sy’air Bey  
Lead Organizer, Springfield Climate Justice Coalition  
Springfield, MA

Mary S. Booth, Ph.D.  
Director, Partnership for Policy Integrity  
Pelham, MA

Attachment:

Joint Letter in Opposition to the Biomass Carbon Neutrality Budget Rider (S.2580, Section 427), Dec. 2, 2019, Berkshire Environmental Action Team, *et al.*

Cc:

Senator Elizabeth Warren  
Senator Edward J. Markey  
Rep. Michael Thompson, Chairman, House Ways and Means Subcommittee on Select Revenue Measures