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SUPPORT H.853

An Act to Assure the Attainment of Greenhouse Gas Emissions Goals in the Alternative Portfolio Standard

Rep. Denise Provost, 27th Middlesex (New File)

WHAT H.853 DOES

H.853 would remove incentives for biomass and garbage incineration from the Massachusetts Alternative Portfolio Standard (APS). These technologies are more polluting than fossil fuels per unit of energy produced and should not be subsidized through Massachusetts' clean energy programs.

THE ISSUE

The APS was initially established to provide incentives for facilities that install energy-efficient heating technologies, such as combined heat and power. It was later expanded to include renewable thermal technologies, including solar hot air and water, air and ground source heat pumps, wood boilers and furnaces (biomass), and garbage incinerators that produce steam energy.

Combustion of biomass and solid waste releases large quantities of greenhouse gas emissions, fine particulates (soot) and other air pollutants. Low-income communities, communities of color, and sensitive populations such as children, the elderly, and people with respiratory ailments are particularly at risk.

Massachusetts already has the highest levels of particulate pollution in New England from residential wood burning. This amendment to the APS is needed to reduce greenhouse gas emissions, protect public health, prevent unsustainable logging activities, and to target financial incentives toward the installation of clean, non-polluting renewable energy systems.

BACKGROUND

Massachusetts established the Alternative Energy Portfolio Standard (APS) in 2009 to complement the state's Renewable Energy Portfolio Standard (RPS). While the RPS is designed to increase the use of renewable energy for electricity, the APS is intended to reduce greenhouse gas emissions from the heating sector. However, the inclusion of biomass and garbage incineration in the APS undermines this goal. Rather than achieving consistency between these two programs, the MA Department of Energy Resources (DOER) issued new regulations in 2017 for forest protection and greenhouse gas emissions under the APS that were substantially weaker than the RPS program and fundamentally undermine Massachusetts' clean energy and sustainable forestry goals.

In December 2017 the *House Committee on Global Warming and Climate Change* convened an oversight hearing to review the proposed regulations. **The Committee recommended that the proposed biomass provisions be delayed "until further calculations are made regarding the greenhouse gas and health impacts" and urged the DOER to "reopen the public comment period on the recently changed provisions" made to the draft regulation after public review had concluded.** Instead, DOER proceeded, only days later, to issue a new – and significantly weaker – regulation on December 29, 2017.

As a direct result of these changes, the APS now subsidizes dozens of polluting wood pellet boilers across the state, as well as the state's oldest garbage incinerator.

Health Impacts: The APS program now in effect does not adequately protect Massachusetts residents from conventional air pollutants such as fine particulates and other harmful emissions from combustion of wood and waste. Massachusetts residents are already exposed to high levels of particulate pollution from residential wood burning. According to the National Emissions Inventory, biomass combustion accounted for 83% of all $PM_{2.5}$ emissions from heating in Massachusetts in 2014, and a quarter of the state's total $PM_{2.5}$ emissions.[1]

In addition to particulates, biomass and waste incineration release large quantities of nitrogen oxides, sulfur dioxide, heavy metals and volatile organic compounds. The weak emissions standards and inadequate enforcement mechanisms for wood boilers in the APS will drive adoption of a technology that emits *hundreds to thousands of times more pollution* than the fossil-fueled boilers it replaces.[2]

Climate Impacts: The climate crisis compels us to take a closer look at what our clean energy programs are subsidizing. While included in the RPS as "renewable energy," both garbage incinerators and biomass power plants release more CO_2 emissions at the stack per megawatt hour than coal-fired power plants. A recent PFPI study shows that even in the industry's "best case" scenario, where only wood residues are burned for energy (as opposed to whole trees), *biomass energy is a net source of carbon for decades*.[3]

Despite what is now known about the lifecycle carbon impacts from combustion of woody biomass and waste, these highly polluting and carbon-intensive technologies benefit from numerous regulatory loopholes and government incentives in Massachusetts and elsewhere that treat them as "clean," "renewable," or "carbon neutral." As a perverse result, *more than 50% of the "renewable energy" in New England's power grid last year came from biomass and garbage burning*.[4] Massachusetts recently received an "F" grade for its renewable energy program from Food & Water Watch, a national watchdog group, citing too many polluting sources in the Commonwealth's renewable energy mix.[5]

Rather than burning trees for energy, Massachusetts should be protecting its forests and growing more trees to enhance natural carbon sequestration, in keeping with the goals of the Paris Climate Agreement and recommendations of the U.S. Climate Alliance, of which Massachusetts is a founding member.

We urge you to support H.853, *An Act To Assure The Attainment Of Greenhouse Gas Emissions Goals In The Alternative Portfolio Standard.* The Commonwealth should not be incentivizing technologies that will increase greenhouse gas emissions, air pollution, and forest destruction. Removing biomass burning and garbage incineration from the APS will protect our health, our climate, and our natural environment, and will accelerate the transition to clean, renewable heating technologies in Massachusetts.

For further information please contact James McCaffrey, New England Legislative Director
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[1] http://www.pfpi.net/massachusetts-tops-northeast-in-air-pollution-from-wood-burning
[2] PFPI et al.; Joint Comments on Revised Proposed Changes to APS Regulations, August 7, 2017
[3] http://www.pfpi.net/biomass-energy-has-big-climate-impact-even-under-best-case-scenario
[4] https://www.iso-ne.com/about/key-stats/resource-mix
[5] https://www.foodandwaterwatch.org/insight/cleanwashing-how-states-count-polluting-energy-sources-renewable