

MASSACHUSETTS ENVIRONMENTAL ENERGY ALLIANCE

April 24, 2009

Mr. Mitchell Adams
Executive Director
Massachusetts Technology Collaborative
75 North Drive
Westborough MA 01581

Re: Grants for Wood-Burning Biomass Projects

Dear Mr. Mitchell,

The Massachusetts Environmental Energy Alliance is writing about the Renewable Energy Trust's (RET) grants for power plants that burn wood as "biomass." We request that RET immediately suspend funding for large-scale commercial power plants because these plants are not "renewable carbon neutral" energy sources. Instead, each megawatt of electricity generated from burning wood creates more carbon emissions than the worst fossil fuel plant. Put another way, it takes one minute to incinerate a tree in a biomass plant, and 75 years, or more, to re-grow that same tree. The burning of that tree creates CO₂ emissions that have no immediate offsets, and worsens the acute crisis in climate change.

To date, RET has provided funds, totaling approximately \$1,000,000, to four large scale, commercial biomass projects in Central and Western Massachusetts (\$250,000 each in predevelopment financing to plants in Greenfield, Pittsfield, Palmer, and Russell). These grants were based on the premise that these plants are "carbon neutral" and that the fuel source is sustainable. RET's scientific basis for classifying wood burning biomass as a renewable, carbon neutral source is contained in RET's 2004 "Climate Protection Plan." See, Table on page 31 of Plan. The Plan states, without citing any scientific data, that the CO₂ emissions of burning wood are "offset by carbon sequestration during biomass regrowth." Current science challenges the 2004 Plan assertion that all biomass, including cutting trees and burning wood, is carbon neutral.¹

¹ See Johnson E, Goodbye to carbon neutral: Getting biomass footprints right, Environ Impact Asses Rev (2008), doi:10.1016/j.eiar.2008.11.002.

The assertion that burning is carbon neutral, “renewable” and an antidote to climate change is not defensible and is highly controversial. Indeed, according to Silvicultural And Ecological Considerations Of Forest Biomass Harvesting In Massachusetts (a Biomass Report funded by MTC and oft cited by woodburning biomass proponents),

Biomass harvesting will have negative impacts on forest carbon storage, largely through the removal and combustion of carbon stores from the harvested site. These harvests not only remove carbon stored in living biomass, but also limit the development of large standing dead trees and downed logs, which are important forest carbon sinks. An additional negative impact comes from the removal of harvest residues from the site. These residues are important for maintaining post-harvest forest floor carbon pools and their removal could lead to reductions in soil carbon sinks (p. 50, Yanai et al. 2003).

RET’s 2004 Plan contains inherent and irresolvable contradictions: first, it asserts that burning wood is carbon neutral, page 31, and then promotes the use of forests as “carbon sinks.” Principle 10, page 44. The Plan claims that the Commonwealth will balance burning wood from public lands with government action to manage state lands for carbon sequestration purposes. The Plan states,

The state will continue its efforts to maintain existing forests, increase land conservation areas, and give incentives for native (non-invasive) reforestation of previously forested areas. The amount of carbon stored or sequestered by these activities will be measured and monitored over time to ensure that real carbon benefits accrue, and to better understand the long-term benefits of such programs.

The Plan also asserts the Commonwealth will have a “carbon resource management plan of state forests and other public lands.” P. 45.

Neither the RET nor the Commonwealth are doing what the Plan claims will be done to ensure that forests are managed for carbon sequestration. In fact, the Commonwealth’s forestry management program is in a state of dysfunction and responsible state officials are currently unable or unwilling to take steps necessary to ensure forest stewardship in a manner consistent with state law. DCR’s flagrant, longstanding and well documented violations of M.G.L. c. 13A, § 2B, c. 131 § 4, and 301 CMR 11.00 were outlined in a letter to the consultant who is reviewing the state’s FSC program. See letter from Attorney Gaffney to Robert Hrubes, Scientific Certification Systems, Point Richmond, CA, dated April 3, 2009.

Five wood burning biomass plants are planned for Western Massachusetts and Connecticut, all within a 50 mile radius of each other. The Massachusetts plants all claim they will use at least some “indigeneous sources” of wood for fuel. There is no credible evidence to show that Massachusetts forests can sustainably supply these plants with wood for their lifecycles.

In conclusion, RET's premise that this biomass source is a "carbon neutral" energy source entitled to RET funding is erroneous and inconsistent with current science. As such, there is no justification for the expenditure of public, taxpayer funds, for plants that worsen climate change.

Very truly yours,

Margaret E. Sheehan, Esq.
732 Main Street
Williamstown MA 01267
For Massachusetts Environmental Energy Alliance

Cc: Representative Robert DeLeo, Speaker of the House
Senator Morrissey and Representative Finegold, Joint Committee
Telecommunications, Energy, Utilities and
Senator Downing