



SUPPORT S.2137/H.3211

An Act limiting the eligibility of woody biomass as an alternative energy supply

Introduced by Sen. Adam Gomez (Hampden) and Rep. Orlando Ramos (Chicopee/Springfield)

BILL PURPOSE:

This legislation will make large and intermediate-sized wood boilers and furnaces ineligible for subsidies through Massachusetts' Alternative Energy Portfolio Standard (APS). The bill grandfathers in existing units that have already been qualified by DOER to participate in the program.

THE ISSUE:

Wood-burning stoves, boilers and furnaces emit a disproportionately large amount of air pollution in Massachusetts. **According to the most recent EPA emissions data, residential and commercial wood heating accounted for 92% of all fine particulate (PM_{2.5}) emissions from Massachusetts' heating sector in 2020, and 29% of the state's total PM_{2.5} emissions.**¹ Fine particles are especially harmful because they lodge deep in the lungs and can cross into the bloodstream. Numerous studies have linked PM_{2.5} exposure to a wide range of acute and chronic health problems, including asthma, heart disease, cancer, birth defects, premature death, and increased risk of infections and mortality from Covid-19. Furthermore, burning wood increases greenhouse gas emissions and contributes to climate change.

In recognition of the health and environmental impacts of woody biomass combustion, in 2022 the amended the state's Renewable Portfolio Standard to remove renewable energy subsidies for biomass power plants. Massachusetts can continue making progress to prevent air pollution and reduce greenhouse gas emissions by eliminating subsidies for commercial-scale wood heating units.

BACKGROUND:

In 2017, the Baker Administration adopted regulations allowing wood heating systems to qualify for credits through the Alternative Energy Portfolio Standard (APS). The APS was initially established under the Green Communities Act of 2008 to provide incentives for facilities that install energy-efficient technologies, such as combined heat and power. The Legislature later expanded the APS to include renewable heating, including units burning woody biomass, provided that they meet strict health and environmental criteria. But the regulations DOER developed for biomass were far weaker than what the APS statute required, raising concerns from the House Committee on Global Warming and Climate Change, which held a hearing on the proposed rules. Later, DOER proposed weakening the biomass standards in the RPS regulations to match the APS standards, in the name of "regulatory streamlining."

¹ <https://www.pfpi.net/2024/04/wood-heating-eclipses-all-other-sources-of-pm2-5-pollution-in-massachusetts/>

WHY THIS LEGISLATION IS NEEDED:

The scientific evidence continues to mount regarding the harmful impacts of air pollution on people's health, in particular on sensitive populations, such as children, the elderly, and people with respiratory ailments, and on low-income communities that are disproportionately burdened by pollution. The US EPA recently strengthened the federal air quality standards for PM_{2.5}, but many health experts believe that there is no safe level of exposure below which negative health effects aren't seen.²

For years, the wood heating industry has contended that so-called "modern wood heating" is clean, efficient, and meets EPA's latest emission standards. However, two recent assessments have shown that these claims are not substantiated. A 2021 [report](#) by the Northeast States for Coordinated Air Use Management (NESCAUM) found that **"EPA's certification program to ensure new wood heaters meet clean air requirements is dysfunctional."**³ The EPA Office of Inspector General subsequently conducted its own [review](#), which found **"The EPA's residential wood heater program puts human health and the environment at risk for exposure to dangerous fine-particulate-matter pollution by allowing sales of wood heaters that may not meet emission standards."**⁴ In 2023, ten states, including Massachusetts, sued the EPA over its failure to properly regulate new wood stoves.⁵

Meanwhile, the climate crisis has grown more urgent, with the most recent Intergovernmental Panel on Climate Change (IPCC) synthesis report calling for "deep, rapid, and sustained reductions" in greenhouse gas emissions across all sectors by 2030 in order to slow down global warming.⁶ Even when only wood *residues* are burned (as opposed to whole trees logged for fuel), wood heating is a net source of carbon emissions in the atmosphere for decades – well past the timeframe for meaningful climate action.⁷ **Massachusetts should focus its clean energy subsidies on measures that actually reduce carbon emissions and protect public health.**

STRONG SUPPORT IN MASSACHUSETTS FOR ENDING BIOMASS SUBSIDIES

Massachusetts groups strongly support ending subsidies for burning woody biomass. More than 100 organizations signed a [letter](#) urging the Legislature to pass this bill and S.2136, which closes the "biomass loophole" in the MLP greenhouse gas emissions standard.⁸ In addition, Governor Maura Healey pledged to end subsidies for forest bioenergy, including commercial-scale heat, as part of her [climate platform](#), stating that "Burning wood for bioenergy depletes our forests, increases greenhouse gas emissions, and is a threat to human health."⁹

PFPI urges you to support and co-sponsor S.2137/H.3211, *An Act limiting the eligibility of woody biomass as an alternative energy supply.*

For further information please contact James McCaffrey, New England Legislative Director, Partnership for Policy Integrity / 617-388-7644 / james.mccaffrey@pfpi.net

² <https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm>

³ <https://www.nescaum.org/documents/nescaum-review-of-epa-rwh-nsps-certification-program-rev-3-30-21.pdf>

⁴ <https://www.epa.gov/office-inspector-general/report-epas-residential-wood-heater-program-does-not-provide-reasonable>

⁵ https://www.epa.gov/system/files/documents/2023-09/1-23CV02767_DocketEntry_09-21-2023_1.pdf

⁶ https://report.ipcc.ch/ar6syr/pdf/IPCC_AR6_SYR_SPM.pdf

⁷ Laganier, J., et al. *Range and Uncertainties...*, <https://onlinelibrary.wiley.com/doi/epdf/10.1111/gcbb.12327>; Booth, M.S., *Not Carbon Neutral...*; <https://iopscience.iop.org/article/10.1088/1748-9326/aaac88>

⁸ https://www.notoxicbiomass.org/_files/ugd/252fbc_8d1d6c82c40548ea9161a1ad69a50c79.pdf

⁹ <https://maurahealey.com/issues/climate/>