



RGGI Program Review Comments

November 29, 2021

The Partnership for Policy Integrity (PFPI) is a Massachusetts-based nonprofit that works regionally, nationally and internationally on forest and climate protection. We appreciate this opportunity to participate in the Third Program Review of the Regional Greenhouse Gas Initiative (RGGI). We will be submitting more detailed recommendations as the review process continues.

High Level Recommendations

Given the importance of RGGI both to achieve emissions reductions and as a model for other carbon trading programs, it is essential that all emissions from the power sector be accounted for as transparently as possible.

Accordingly, PFPI strongly recommends that the RGGI program review include modeling to determine the contribution of bioenergy to the region's power sector emissions, instead of the current program assumption of zero carbon emissions from burning wood fuels.

Such modeling should include the following sensitivities: an assumption of actual stack emissions - at the point of combustion - and net emissions, which reflect a partial discounting of CO₂ emissions based on an assumption of future carbon uptake of forest growth over a climate relevant timeframe. Based on the IPCC 1.5 report, this timeframe should be set at no more than ten years.

RGGI currently treats bioenergy as if it has zero carbon emissions, but this assumption has long since been debunked. In fact, the day-to-day stack emissions from biomass electricity plants far exceed those from even the dirtiest fossil fuel plants per unit of energy generated.

Highly relevant to the RGGI region is the 2010 Manomet study commissioned by the State of Massachusetts.¹ When calculating "net emissions," the Manomet study found that it would take more than 45 years to offset the emissions from a wood-burning power plant to the point of equivalency with emissions from a coal-fired power plant. The carbon debt payoff time relative to a natural gas plant is more than 90 years.

Not counting bioenergy's carbon emissions thus leads to a large discrepancy between reported emissions under RGGI, and actual emissions from the power sector.

¹ Thomas Walker, *et al.*, Manomet Center for Conservation Sciences. Biomass Sustainability and Carbon Policy Study (June 2010). Prepared for the Massachusetts Department of Energy Resources, <https://www.mass.gov/files/documents/2016/08/gx/manomet-biomass-report-full-hirez.pdf>

Environmental Justice Considerations

In addition, the continued exemption of biomass emissions raises significant environmental justice and equity issues. Biomass power plants generate comparable emissions of PM_{2.5} and other health-harming air pollutants as coal plants.² Across the country, biomass power plants are disproportionately sited in low-income communities and communities of color. Yet they materially benefit from renewable energy subsidies and programs, such as RGGI, that treat their carbon emissions as zero.

The health impacts of biomass power plants are finally being recognized. Recently, the Massachusetts Department of Environmental Protection revoked the operating permit for a proposed wood-burning power plant in Springfield, MA citing concerns about the health and environmental justice impacts of this facility.³ A growing body of research has linked exposure to fine particulate emissions and a wide range of acute and chronic health problems, including asthma, heart disease, cancer, birth defects, and, most recently, increased risk of mortality from Covid-19.⁴

Forest and Climate Protection

Last, but certainly not least, the IPCC 1.5 report underscored the urgency of both achieving faster and steeper emissions reductions and protecting and increasing our forests as natural carbon sinks. Logging and burning our forests for energy is counterproductive to all of the steps we need to take to protect our planet.

PFPI and our colleagues have brought these concerns forward during previous RGGI Program Reviews. We hope that this time RGGI will properly account for bioenergy emissions and make necessary reforms to the model rule.

Sincerely,

A handwritten signature in black ink that reads "Laura Haight". The signature is written in a cursive style with a large, looping initial "L".

Laura Haight
U.S. Policy Director

² Mary S. Booth, *Trees, Trash, and Toxics: How Biomass Energy Has Become the New Coal*, (PFPI), April 2014, at <https://www.pfpi.net/wp-content/uploads/2014/04/PFPI-Biomass-is-the-New-Coal-April-2-2014.pdf>

³ Michael Gorski, MA Dept of Env'l Protection. Letter to Victor Gatto, Palmer Renewable Energy LLC, April 2, 2021, <https://www.pfpi.net/wp-content/uploads/2021/04/Palmer-Renewables-Revocation-Final-1.pdf>

⁴ Xiao Wu, Rachel C. Nethery, Benjamin M. Sabath, Danielle Braun, Francesca Dominici; Exposure to air pollution and COVID-19 mortality in the United States: A nationwide cross-sectional study. Preprint posted April 27, 2020 at <https://www.medrxiv.org/content/10.1101/2020.04.05.20054502v2>