

United States Senate

December 24, 2020

Martin Suuberg
Commissioner
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

Dear Commissioner Suuberg,

We write to urge the Massachusetts Department of Environmental Protection (MassDEP) to consider suspending the Conditional Approval for Comprehensive Plan Approval (Conditional Approval) issued to Palmer Renewable Energy LLC (Palmer) for a proposed biomass-fired power plant in Springfield, Massachusetts, so that the new Biden administration can review and potentially issue new regulations for biomass pollution and climate impact. In addition to suspending the approval, MassDEP should conduct a new review of the proposed plant's air quality impacts that accounts for the ongoing respiratory health pandemic, new public health data, and the accelerating climate crisis. Springfield residents deserve an updated air quality analysis that reflects the city's current health and environmental justice issues, which have become more acute in the decade since MassDEP initially issued the Conditional Approval.

Springfield already suffers from extremely high rates of respiratory illness. Nearly one in five children in Springfield have asthma—a rate more than twice the national prevalence rate of 8 percent.¹ In 2018 and 2019, the Asthma and Allergy Foundation of America ranked Springfield as its top “Asthma Capital” and the most challenging place in the U.S. to live with asthma.² The proposed Palmer biomass plant would only exacerbate this serious problem. The plant is expected to burn approximately one ton of wood per minute and emit fine particulate matter, nitrogen oxides, sulfur dioxide, and other harmful pollutants,³ which can damage the human respiratory system and make breathing difficult.⁴

Additionally, COVID-19 has continued to spread throughout the region, with more than 7,730 cases and 145 deaths in Springfield over the course of the pandemic.⁵ Recent research has linked

¹ Pioneer Valley Asthma Coalition, https://pvasthmacoalition.org/asthma_facts_awareness (last visited Dec. 8, 2020).

² Springfield, Massachusetts: Why It's the #1 Asthma Capital, <https://community.aafa.org/blog/springfield-massachusetts-why-it-s-the-1-asthma-capital> (last visited Nov. 23, 2020).

³ David Abel, *In the nation's asthma capital, plans to burn wood for energy spark fury*, Boston Globe (Oct. 20, 2020), <https://www.bostonglobe.com/2020/10/20/science/nations-asthma-capital-plans-burn-wood-energy-spark-fury/>.

⁴ U.S. Environmental Protection Agency, <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects> (last visited Dec. 7, 2020).

⁵ Peter Goonan, *New COVID-19 cases in Springfield jump 73% in single week*, MassLive.com (Dec. 7, 2020), <https://www.masslive.com/coronavirus/2020/12/new-covid-19-cases-in-springfield-jump-42-in-single-week.html>.

poor air quality to a disproportionately high rate of coronavirus illness and death,⁶ and a report by the Office of Massachusetts Attorney General Maura Healey found that COVID-19 has had a disproportionate effect on communities of color in Massachusetts' largest municipalities.⁷ As the third-largest city in Massachusetts, with high levels of air pollution, and nearly 90 percent of residents categorized as living within an environmental justice population,⁸ Springfield has multiple intersecting factors that combine to heighten the citywide risk of COVID-19. In reassessing the Palmer biomass plant proposal, MassDEP needs to account for the latest research into the spread of COVID-19, the respiratory health risks in the surrounding population, and the historic burden of air pollution on the local community.

Furthermore, the body of scientific evidence on climate change and biomass energy has grown significantly since MassDEP originally issued the Conditional Approval. A wood-burning power plant has a carbon dioxide emissions rate that is approximately fifty percent higher than that of a coal-fired power plant, emitting approximately 3,000 pounds of carbon dioxide per megawatt-hour.⁹ Scientific studies, including one commissioned by the Commonwealth of Massachusetts, have found that it takes decades of forest regeneration to offset these emissions.¹⁰ The proposed Springfield biomass plant would therefore undermine Massachusetts' climate, environmental justice, and clean energy goals.

The Clean Air Act allows the federal government to delegate authority to state agencies to regulate intrastate sources of air pollution, in line with federal standards.¹¹ The U.S. Environmental Protection Agency has approved Massachusetts' State Implementation Plan for air quality standards, giving MassDEP the authority to review air quality impacts and issue permits to polluting facilities. And since 2013, MassDEP has had the legal authority under 301 CMR 7.02(3)(k) to revoke the 2011 Conditional Approval for the proposed biomass-fired power plant in Springfield based on Palmer's failure to commence construction of the plant. As our understanding of the threats posed to air quality, public health, and the climate increases—and as the new Biden administration develops its air and climate policies—we urge MassDEP to use its

⁶ Antonio Frontera *et al.*, *Severe air pollution links to higher mortality in COVID-19 patients: The "double-hit" hypothesis*, *J Infect.* (Aug. 2020), published online May 21, 2020, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7240268/>.

⁷ Office of Massachusetts Attorney General Maura Healey, *COVID-19's Unequal Effects in Massachusetts* (2020), <https://www.mass.gov/doc/covid-19s-unequal-effects-in-massachusetts/download#:~:text=COVID%2D19%20is%20disproportionately%20impacting.residents%20are%20people%20of%20color.>

⁸ MA Executive Office of Energy and Environmental Affairs, *2010 Environmental Justice Populations*, <https://www.mass.gov/doc/ej2010communitystatisticspdf/download> (last visited Nov. 23, 2020).

⁹ Mary S. Booth, *Trees, Trash, and Toxics: How Biomass Energy Has Become the New Coal*, Partnership for Policy Integrity (Apr. 2, 2014), <https://www.pfpi.net/wp-content/uploads/2014/04/PFPI-Biomass-is-the-New-Coal-April-2-2014.pdf>.

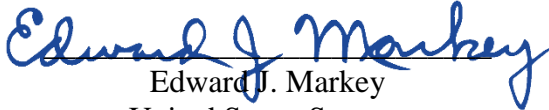
¹⁰ Thomas Walker *et al.*, *Carbon Accounting for Woody Biomass from Massachusetts (USA) Managed Forests: A Framework for Determining the Temporal Impacts of Wood Biomass Energy on Atmospheric Greenhouse Gas Levels*, *J. Sustainable Forestry*, 32:1-2, 130-158 (2013); John D. Serman *et al.*, *2018 Environ. Res. Lett.* 13 015007, <https://iopscience.iop.org/article/10.1088/1748-9326/aaa512/pdf..>


¹¹ 42 U.S.C. §§ 7401-7671 (1990).

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authority to consider suspending the Conditional Approval and reconsider its decade-old decision to grant Palmer an air quality permit for the biomass-fired power plant in Springfield.

Sincerely,


Edward J. Markey
United States Senator


Elizabeth Warren
United States Senator