

July 17, 2025

Via Electronic Mail and Electronic Filing

Maura A. Looney, Clerk
Supreme Judicial Court for the Commonwealth
John Adams Courthouse
One Pemberton Square
Boston, MA 02108
Maura.Looney@jud.state.ma.us

Re: Palmer Renewable Energy, LLC v. City Council of the City of Springfield and
Zoning Board of Appeals of the City of Springfield, et al.
No. FAR-30366; Letter of Support for FAR Application

Dear Clerk Looney:

I am a member of the Steering Committee of the Springfield Climate Justice Coalition (SCJC), and I submit this letter in support of the application for further appellate review (FAR Application) filed in Palmer Renewable Energy, LLC v. City Council of the City of Springfield and Zoning Board of Appeals of the City of Springfield, et al., No. FAR-30366. As explained below, there are substantial reasons for the Court to grant the FAR Application affecting the public interest and interests of justice.

SCJC was formed in 2014 due to increasing concern for the future of our health and safety as the climate crisis intensifies. Our diverse coalition includes grassroots community and public health organizations, climate/environmental justice groups and faith-based groups, youth and elders. SCJC has seen major victories in recent years, including the City of Springfield's decision to implement a Climate Action and Resilience Plan. Today, SCJC is a vital and growing movement of organizations and individuals across the greater Springfield area.

SCJC and our allies¹ have worked to prevent Palmer Renewable Energy from building a toxic and highly polluting biomass power plant in East Springfield since the plant was first proposed

¹ In accordance with the procedural requirements of the Court, I am submitting this letter *pro se* as an individual. Please note that SCJC and the following allies have asked to sign on to this letter in support of the FAR Application: Senator Adam Gomez, Hampden District; Arise for Social Justice; Concerned Citizens for Springfield; East Forest Park Civic Association; Indian Orchard Citizens Council; Live Well Springfield; Metro Center Association; Neighbor to Neighbor; Pioneer Valley Asthma Coalition; Pioneer Valley Project; Public Health Institute of Western MA; Revitalize Community Development Corporation; Springfield Conservation and Nature Stewardship; Springfield No One Leaves; Unitarian Universalist Society of Greater Springfield; Wellspring Cooperative; Climate & Democracy Project of Franklin County; Climate Action Now Western Mass; Partnership for Policy Integrity; Slingshot; Traprock Center for Peace and Justice; and the Wendell State Forest Alliance.

over fifteen years ago. Our community has cheered at this power plant's defeat repeatedly, only to see it rise from the dead again and again.

As the American Lung Association states, "pollution from the combustion of wood and other biomass sources poses a significant threat to human health."² That national health advocacy organization opposes biomass incineration for electricity generation.³ Numerous studies⁴ have linked wood smoke exposure to a range of both acute and chronic health problems, including:

- Bronchitis, increased asthma attacks and emergency room visits;
- Increased risk of heart attacks and death from strokes;
- Increase in infant mortality, stillbirth, low birthweight, reduction in fetal head size, with effects similar to those of smoking during pregnancy;
- Neurological development;
- Genetic defects linked to COPD and asthma, changes in immune response; and
- Cancer, including childhood brain tumors, lymphoblastic leukemia, and higher likelihood of lung cancer.

A number of the studies cited have found no "safe" level of particulate matter at which the adverse effects disappear. Many Springfield residents, including members of SCJC, already suffer from asthma and other chronic health conditions; Springfield has at times been ranked the #1 "asthma capital" in the nation by the Asthma and Allergy Foundation of America.⁵ The Springfield community worked hard to improve treatment for respiratory illness and reduce incidence of respiratory emergencies, and as a result we dropped out of the top 10 ranking for several years, but in 2024 we once again rose to the rank of 4th in the nation.⁶ The 2025 American Lung Association "State of the Air" report gave Hampden County a grade of D for 8 hour PM2.5.⁷ The 2023 Air Quality Report issued by the Massachusetts Department of

² See <https://www.lung.org/policy-advocacy/public-policy-positions/public-policy-position-energy> (last visited June 27, 2025).

³ *Id.*

⁴ For more information, please visit *Doctors and Scientists Against Woodsmoke Pollution*, www.woodsmokepollution.org (last visited June 27, 2025).

⁵ See <https://www.aafa.org/wp-content/uploads/2022/10/aafa-2019-asthma-capitals-report.pdf> (last visited June 27, 2025).

⁶ See <https://aafa.org/wp-content/uploads/2024/09/aafa-2024-asthma-capitals-report.pdf> (last visited June 27, 2025).

⁷ See <https://www.lung.org/research/sota/city-rankings/states/massachusetts/hampden> (last visited June 28, 2025).

Environmental Protection (MassDEP) found that Liberty Street in Springfield had the highest PM2.5 rating in the state.⁸

Biomass plants emit large quantities of fine particulates (PM2.5) and other harmful air pollutants, and are disproportionately sited in low-income communities and communities of color, adding to the health burdens in our communities. Indeed, MassDEP revoked the air permit for this biomass plant in 2021,⁹ citing “the heightened focus on environmental and health impacts on environmental justice populations from sources of pollution during the intervening years” (nearly nine years passed between the issuance and revocation of the permit) as a reason to support its decision to revoke that permit. The air permit revocation is now the subject of another lawsuit.

In addition to exacerbating pollution from fine particulate matter in Springfield, constructing biomass power plants goes against our Commonwealth’s and City’s climate policies, which have been strengthened since the plant was first proposed. Biomass plants emit 50% - 60% more CO2 than modern coal plants and 200-300% more CO2 than natural gas plants per unit of energy generated.¹⁰ Net CO2 emissions from burning forest wood exceed emissions from fossil fuels for decades to over a century.¹¹

Climate and environmental realities have changed much in the 14 years since the permits for the biomass plant were first issued. After so many years watching increasingly severe heat waves and suffering from wildfire smoke settling into the Connecticut River Valley all the way from Canada, I am shocked that these permits have been allowed to be revived. I consider it extremely likely that the rise in respiratory emergencies and illness in our community is due to the impact

⁸ See <https://www.mass.gov/doc/2023-annual-air-quality-report/download> (last visited June 28, 2025).

⁹ See Revocation of Plan Approval dated September 11, 2012 for Palmer Renewable Energy, LLC 35 MW Biomass-Fired Power Plant Application #1-P-08-036 Transmission #X224282. MassDEP found that construction had not “commenced” within the meaning of 310 CMR 7.02(3)(k), which affords the agency the discretion to revoke an air permit if construction has not commenced within two years of the date of agency approval.

¹⁰ See Manomet Center for Conservation Sciences. 2010, *Massachusetts Biomass Sustainability and Carbon Policy Study: Report to the Commonwealth of Massachusetts Department of Energy Resources*, Walker, T. (Ed.) at p.7 (available at https://www.mass.gov/doc/Manometbiomassreport_fullhirezpdf/download) (last visited June 29, 2025); see also <https://www.pfpi.net/carbon-emissions/> (last visited June 29, 2025).

¹¹ See *id.*

of climate-change driven extreme heat and air pollution, coexposure to which can increase the risk of cardiovascular and respiratory mortality by 29.9% and 38% respectively.¹²

The Springfield community is particularly vulnerable to the impacts of the climate crisis, as are many low-income environmental justice communities. Many households in our community cannot afford to install or pay the bills for air conditioning, so they have no choice but to suffer through the extreme heat, often with windows left open for air circulation, which allows outdoor air pollution in. Like many environmental justice communities, Springfield is impacted by the urban heat island effect, which raises temperatures in the city and worsens the severity of heat waves,¹³ thereby exacerbating the impact of poor air quality and worsening rates of heat induced medical emergencies. Any community would be negatively impacted by the pollution emitted by a large-scale woody biomass burning energy plant, but Springfield, with our high rates of respiratory illness, quantity of homes unprotected from heat and the intrusion of air pollution, urban heat islands, and our position in a valley that traps air pollution in our communities,¹⁴ is especially poorly positioned to cope with the pollution this proposed plant would bring.

While this power plant proposal keeps returning from the dead, we as a community have lost some of our fiercest advocates forever – to lung cancer. In 2019, SCJC Steering Committee member Michaelann Bewsee, founder and former executive director of Arise for Social Justice and one of the founders of the Springfield Climate Justice Coalition, died from complications of lung cancer. In 2020, SCJC Steering Committee member Dr. Martha Nathan retired from her work as a family physician at Baystate Brightwood Health Center in Springfield due to health problems; she lost her battle with lung cancer and heart disease in 2021, but continued to participate in the fight against the proposed Palmer plant until her passing. I personally have multiple chronic illnesses, including asthma, and I am a cancer survivor. I viscerally understand the stakes that are at play here. This is about my health and survival, as well as the health and survival of my community.

The member organizations of SCJC and other allies have continued this fight since 2008 – at the municipal level, through community education and advocacy around local permitting; at the Statehouse in legislative hearings to remove incentives for biomass energy; in meetings with the Governor’s administration, Attorney General’s Office, and federal representatives; on the streets;

¹² *The Effects of Coexposure to Extremes of Heat and Particulate Air Pollution on Mortality in California: Implications for Climate Change*, <https://www.atsjournals.org/doi/10.1164/rccm.202204-0657OC> (last visited June 27, 2025).

¹³ See *Urban heat islands and a climate of inequalities* <https://seas.umich.edu/news/urban-heat-islands-And-climate-inequities-0> (last visited June 27, 2025).

¹⁴ See *Topography’s Impact on Air Pollution: A Complex Relationship* <https://shunwaste.com/article/How-does-topography-affect-air-pollution> (last visited June 27, 2025).

and in the courts. We simply seek to protect our community and our climate. At a fundamental, commonsense level, permits issued and revoked during the Patrick administration should not be allowed to persist through some zombie apocalypse scenario that perpetually extends permits for yet another two years. We are now almost twenty years out from when the plant was first proposed, with stronger climate and EJ policies now in place at the state and local level.

Please grant the FAR Application so that our community can finally put this matter to rest.

Respectfully submitted,

/s/Naiia Tenerowicz

Naiia Tenerowicz

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CERTIFICATE OF SERVICE

I certify that I have this 17th day of July 2025, caused a copy of this letter to be served via e-mail to the following addresses:

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