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June 7, 2019

Mr. John Wassam
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

via electronic transmission
to DOER.RPS@mass.gov

Re: Proposed Changes to RPS Class I and RPS
Class II Regulations

Dear Sir;

First we would like to thank you for this opportunity to provide input, and thank you for agreeing to a hearing in Western Massachusetts.

Then we should preface our remarks by stating that we are a community-based non-profit organization based in Springfield but oriented to promoting balanced regional economic development. Our programs have focused on restoration of historic buildings to reduce the impact of the construction demolition cycle on the environment, increasing equity for diverse populations, including both urban and rural people, development community-based solar power, and use of both ongoing restoration work and green facilities development to provide for workforce development. We attempt to work closely with organized both the business sector and organized labor and feel it is part of our charge to support and nurture both.

However, that being said, we also feel strongly that public health is an inherent part of economic development. Springfield and other communities in the Pioneer Valley have been living with overly high levels of air pollution for many years because the geography creates a temperature inversion which frequently confines pollutants to the Valley. This impacts the health of all residents, increases respiratory ailments, and impacts negatively on those who already have respiratory issues, economically as well as in terms of their health.

Therefore we strongly oppose any amendments to the RPS Class I and RPS Class II Regulations or any other regulations that would

promote the burning of wood or other biomass within the Pioneer Valley.

We are open to learning about other options and suggest that DOER should research possible methods of burning biomass in locations outside the Valley, particularly on higher ground, where the products of combustion might be able to be dissipated safely without negative impacts on health.

However at present the safety and positive environmental impact of these options has not been demonstrated, so please record us as being opposed to these amendments and to biomass generation in general until these issues are resolved.

Thank you again for this opportunity to provide input.

Sincerely yours,

David P. Gaby
Coordinator

Adaptive Preservation Project

cc: Gov. Charlie Baker
State Sen. James Welch
State Rep. Bud L. Williams
Springfield City Council
MCAN
ARISE
file