



Memo of Opposition

225 CMR 14 Renewable Energy Portfolio
Standard Class I

225 CMR 15 Renewable Energy Portfolio
Standard Class II

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Massachusetts Department of Energy Resources
Attn: John Wassam
100 Cambridge Street, Suite 1020
Boston, MA 02114

The mission of the American Lung Association is to save lives by preventing lung disease and improving lung health through research, education and advocacy. For 115 years, the American Lung Association has led the fight for healthy lungs and healthy air. Today, our work is more important than ever.

The Lung Association is opposed to the proposed amendments to 225 CMR 14 RPS Class I and 225 CMR 15 RPS Class II. **Rolling back** the biomass rules and diminishing the efficacy of our renewable energy policies is a step in the wrong direction. In 2012, Massachusetts biomass rules became the first in the nation and the world to recognize that burning trees for energy **increases emissions**. This fact has not changed. Like all forms of combustion, burning wood for any reason creates significant airborne emissions, and wood produces more harmful particulate matter than equivalent amounts of oil or gas

Grounded in public health protection, our policy positions on combustion technologies being considered are clear, and dictate our opposition to the proposed changes:

- The American Lung Association does not support biomass combustion for electricity production.
- The American Lung Association does not support incineration of municipal solid waste or other waste for electricity production.
- The American Lung Association supports policies and incentives that will encourage the development and deployment of clean, renewable energy resources that are not combustion based, including wind, solar and geothermal.

This year in our “State of the Air” report, climate change impacts to our air showed up in the form of increased ozone pollution across the United States and locally, 8 out of 12 counties in Massachusetts showed an increase in ozone pollution. For the first time, Barnstable, Bristol, Hampden and Hampshire counties received a failing grade for high ozone days. Fortunately, Massachusetts maintained high marks for particle pollution in our 2019 report, but **an expansion of biomass burning power plants could reverse the good progress made in cutting harmful pollutants**. Ozone pollution and particle pollution are two of the most widespread and dangerous air pollutants. Breathing these pollutants can cause asthma attacks, respiratory and

cardiovascular harm, and even early death. Breathing particle pollution can also cause lung cancer. The potential for increases in local particle pollution emissions due to the expansion of biomass is a significant concern for local communities, and especially those already impacted by asthma and other respiratory and cardiovascular illnesses.

Currently almost 300,000 people in Massachusetts are suffering from Chronic Obstructive Pulmonary Disease (COPD) and approximately 850,000 Massachusetts adults and children combined are living with asthma. In the United States more than 141.1 million Americans live in counties where they are exposed to unhealthful levels of air pollution in the form of either ozone or particle pollution. By enforcing state of the art pollution controls, current renewable energy definitions and science-based carbon accounting practices included in the 2012 rules related to biomass sources, you can help us in the fight for healthy lungs and air and protect vulnerable populations.

Changing definitions and accounting practices that would allow increases in biomass combustion in Massachusetts is at odds with our commitments to clean air and leadership for a healthy climate.

For more information please contact: Elizabeth Hamlin Director of Advocacy in Massachusetts, Elizabeth.Hamlin@lung.org or 518.545.5045