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June 15, 2009

Town of Greenfield
Zoning Board of Appeals
14 Court Sq
Greenfield, MA 01301

RE: Pioneer Valley Renewable Energy

Dear Zoning Board of Appeals Members:

The American Lung Association in Massachusetts would like to thank the Greenfield Zoning Board of Appeals for the opportunity to comment on the proposed biomass plant (Pioneer Valley Renewable Energy) in Greenfield, Massachusetts. As advocates for the promotion of lung health and prevention of lung disease, we believe that the following points should be considered:

- Prior to considering new sources of power, the American Lung Association believes that a significant effort must take place in energy conservation and efficiency
- When expanding power generation capacity, communities should explore ways to use sources of non-polluting renewable energy (i.e. wind, solar, geothermal and tidal)
- Biomass is renewable, but, we do not consider it non-polluting. The levels of fine particles and ozone (through emissions of nitrogen oxides) released through biomass burning and diesel emissions from delivery trucks are just cause for serious public health concerns
- Massachusetts already suffers disproportionately from the health impact and health care costs created by poor air quality
- Given the technology and the natural resources available, communities should not be forced to choose between electric power and their health

It is important to understand that our organization does not have the expertise to determine whether or not additional generating power is actually needed. For the sake of this letter, we will assume that the case for more power has been convincingly made.

Once the need for additional power is agreed upon, we have two questions that must be addressed before proceeding. We believe that the major strategies for addressing air pollution from energy sources in the future must focus on improved energy efficiency and expanding non-polluting forms of energy, especially wind, solar, geothermal and tidal.

Prior to being supportive of more power generation, we would want to be assured that reasonable efforts have been undertaken in energy conservation and improved efficiency. This strategy can have significant impact when implemented by a large population. For example, if every household in New England were to replace just one incandescent bulb with a compact fluorescent, that would save the equivalent energy produced by a

240 MW power plant each year.

Exploring non-polluting renewable alternatives is particularly important when you consider that Massachusetts already suffers the health impact and health care costs created by poor air quality. The more we learn about air pollution, we find it is more dangerous than we previously thought and that health impacts occur at levels once thought to be "safe". While everyone is affected by unhealthy air, children, pregnant women and those with chronic lung disease, heart disease and asthma suffer the brunt of the impact. Massachusetts not only has one of the highest asthma rates in the nation, but thousands of others in the state are at special risk from air pollution. As advocates for healthy air and lungs, the American Lung Association in Massachusetts believes that we can not compromise our health in favor of energy production.

Although often praised because of its renewable quality, the American Lung Association sees biomass burning as a significant source of air pollution. Specifically, the levels of fine particles and ozone (through emissions of nitrogen oxides) released through biomass burning raise serious concerns. The relative impacts of these pollutants need to be carefully considered when weighing the pros and cons of different energy sources.

For any biomass plant approved by state regulators it will be critical that the monitoring of pollution from the plant be rigorously and regularly reviewed to assure that the predicted and actual pollution released are acceptable and safe. Public disclosure of these findings will assure accountability. Many people have had the experience of purchasing a vehicle that manufacturers claimed would get a certain number of miles per gallon only to find that the real mileage was not even close. While monitoring at the smokestack level is important, it is not sufficient to understand the full impact of the plant on air quality in the area.

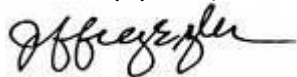
Diesel exhaust is another dangerous air pollutant that will significantly increase local pollution as wood supply trucks deliver their load. The age of these vehicles, the type of diesel fuel being used and idling practices will also have a significant influence on the levels of pollution from this source.

If used strictly for energy production, biomass plants only have a conversion efficiency of 17 to 25 percent. This translates to about 1 cord of energy production per every 4 cords of wood burned. In other words, you get the pollution from 4 cords of wood but the energy from only one. This also translates to much more frequent deliveries by diesel trucks both to and from the biomass facility. If biomass plants use their boilers to produce and use both electricity and the heat generated, this improves overall system efficiency to as much as 85 percent.

The American Lung Association in Massachusetts is a public health organization. During our 100 year history, we have been fighting such worthy opponents as tuberculosis and tobacco. We understand that jobs are important for a healthy community and that electricity is a vital commodity for commerce and prosperity. But, given the technology and the natural resources available to us, we don't believe that anyone should be forced to choose between electric power and their health. It is a false choice we need not make. The air we breathe should not make us sick, period.

Again, thank you for the opportunity to share our viewpoint on this important subject.

Sincerely yours,



Jeffrey Seyler
President & CEO