



August 1, 2017

Stephen Pike, Chief Executive Officer
Massachusetts Clean Energy Center
63 Franklin Street, 3rd Floor
Boston, MA 02110
By email to: spike@masscec.com

Re: Recommend removal of biomass from HeatSmart Massachusetts Program

Dear Mr. Pike,

The Partnership for Policy Integrity (PFPI) is a Massachusetts-based nonprofit that provides science to inform policy on clean energy. We have reviewed the Massachusetts Clean Energy Center's (CEC) Request for Proposals for the HeatSmart Massachusetts Pilot Study. According to CEC's website, "HeatSmart Mass is a community-based outreach and education program that will encourage clean heating and cooling technologies that include air-source heat pumps, ground-source heat pumps, **central biomass heating**, and solar hot water." We believe including biomass along with zero-emissions technologies undermines the fundamental objectives of the program.

We don't understand why CEC, a publicly-funded agency dedicated to accelerating the success of clean energy technologies, is including wood burning on the list of "clean" heating options. Given that wood boilers emit more CO₂, particulate matter and other air pollutants than new fossil-fired boilers, use of the word "clean" is misleading. It is particularly inappropriate to be promoting wood-burning given that Massachusetts has more air pollution from wood smoke than any other New England state, with wood emissions **contributing 83 percent of PM_{2.5} pollution from all heating sources in Massachusetts** and a quarter of the state's total PM_{2.5} emissions.¹

CEC's website notes that "Communities with significant forestry resources and/or a high percentage of existing wood heating may be well-suited for this technology due to greater connection to the woody biomass supply chain and greater existing familiarity with wood heating." The opposite is the case. Massachusetts' rural communities already rely heavily on wood heat, leaving many communities with very serious and almost universally unabated local air pollution from wood smoke. Where the public health costs have been reviewed, the data are clear that wood smoke exposure degrades public health. This program will add to that personal and societal burden.

Just as importantly, as documented by the state-commissioned Manomet Study, burning wood increases net greenhouse gas emissions for years to decades, even when used in high-efficiency heating boilers. Again, given your agency's concern about reducing greenhouse gas emissions, referring to wood-burning as "clean" is misleading.

Massachusetts has already given away millions of dollars of ratepayer and taxpayer money to promote wood heat and wood pellets. It is time for the Commonwealth, and all of its agencies, to stop promoting wood as a "clean fuel" and focus efforts on technologies that actually reduce air pollution and greenhouse gas emissions.

Therefore, we are asking you to remove biomass from the list of subsidized heating sources in the HeatSmart Pilot Study.

Sincerely,

Mary Booth, Ph.D.
Director

cc: Judith F. Judson, Commissioner, MA DOER

¹ U.S. Environmental Protection Agency. National Emissions Inventory, 2014. Released April, 2017, accessed July 31, 2017.