

March 4, 2013

Greenfield Department of Planning and Development  
Attn: Eric Twarog, Director  
114 Main Street  
Greenfield, MA 01370

RE: Proposed Biomass Energy and Waste-To-Energy Moratorium Bylaw

Dear Mr. Twarog,

The American Lung Association in Massachusetts would like to thank the Greenfield Department of Planning and Development for the opportunity to comment in support of the proposed Biomass Energy and Waste-To-Energy Moratorium Bylaw.

The American Lung Association does not support incineration of waste or biomass for electricity or heat production. Combustion of these materials is a significant source of air pollution. Specifically, the levels of fine particles and precursors of ozone released through combustion raise serious health concerns. The relative impacts of these pollutants need to be carefully considered when weighing the pros and cons of different energy sources including the cumulative impacts of various wood burning practices in the Town, and how large biomass facilities and waste incinerators would add to those impacts.

This zoning bylaw change would place a moratorium on larger biomass combustion facilities and municipal waste-to-energy incinerators until September 15, 2014. This would give Greenfield adequate time to engage in a planning process to address the effects (including health) of such structures and to establish local regulations to ensure that future energy production and waste disposal facility decisions are consistent with the best interests of the Town of Greenfield.

The American Lung Association supports policies to minimize the human health, particularly lung health, impacts associated with the disposal of wastes and production of electricity. 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". Local policies must protect the public against acute and chronic adverse health effects. While everyone is affected by unhealthy air, we are especially concerned about the effects of air pollution on the health of vulnerable populations, including the 1 in 10 children living with asthma and the nearly 300,000 adults with chronic obstructive pulmonary disease (COPD) in Massachusetts.

Current local zoning laws leave citizens vulnerable to the negative health consequences of biomass and waste-to-energy incineration projects that may be proposed or built. This moratorium gives Greenfield an opportunity to consider the health impact of energy choices and allows its residents a chance to decide what is right for Greenfield. Thank you for your consideration of this important issue.

Sincerely,



Kathleen King  
Director, Public Policy