American Lung Association.

November 23, 2021

Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

COMMENTS Regarding Accounting for Biomass Emissions

To Whom It May Concern,

My name is Ruth Canovi. I work as the Director of Advocacy for the American Lung Association in Connecticut. I am writing to express our concern and opposition to burning biomass for energy in Connecticut. The American Lung Association views biomass as a significant source of air pollution and unnecessary risk to both our state's health and air quality. Numerous medical and scientific studies have irrefutably proven that air pollution can negatively affect both our health and the environment we live in. We oppose the recommendation to count biomass as a zero emission source for the state's Electricity-Sector Greenhouse Gas Accounting.

Biomass is anything but "clean" energy. Biomass produces significant amounts of carbon monoxide, carbon dioxide, and other airborne particulates and contaminants, sometimes at levels which exceed traditional fossil fuel energy sources. These contaminants violate clean air and water statutes. In harvesting the fuels needed for biomass energy production, there is also scientific evidence that a stand of uncut trees may be able to sequester and take more carbon out of the atmosphere. This means that biomass not only produces more carbon while burning but also removes the ability of trees harvested to pull carbon out of the atmosphere. Further, biomass combustion generates black carbon, a potent short-lived climate pollutant.

Biomass is not a zero-emission fuel and should not be treated as such. Burning biomass creates air pollution that causes many health harms. Biomass emissions contain fine particulate matter, sulfur oxides, carbon monoxide, volatile organic compounds, and various irritant gases such as nitrogen oxides that can scar the lungs. These emissions contribute to poor air quality days and put too many people at risk for poor health outcomes. For vulnerable populations (such as people with asthma, chronic respiratory disease, or cardiovascular disease), biomass emissions are particularly harmful. Even short exposures can prove deadly. An increasing number of studies are pointing to the direct impact of increased particle pollution levels and an increase in heart attacks. The fine particles produced by biomass combustion are extremely small and are unable to be

filtered out of our respiratory system. Instead, these small particles end up deep in the lungs where they can trigger serious health impacts. In some cases the particles can move through the lungs and penetrate the bloodstream, creating cardiovascular impacts including heart attacks, strokes and premature death.

The state's greenhouse gas emissions goals are set to protect public health and our earth. Counting biomass as a zero-emission source protects neither our earth or our health. 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. The American Lung Association supports the protection of all people from the harm of air pollution, especially those who suffer disproportionate exposure from local sources of emissions.

Because of the serious health risks associated with burning biomass, the American Lung Association opposes the reclassification of this harmful combustion as zero-emission. We strongly urge you to look to more effective and cleaner energy sources for a healthier Connecticut.

Sincerely,
Ruth Canovi, MPH
Director, Advocacy
American Lung Association in Connecticut