

As a lifelong NYS citizen, I am writing to submit a comment on the NYS Energy Plan.

With the increasing energy costs associated with fossil fuels, I am deeply concerned about the propagation of inefficient, polluting biomass combustion devices in NYS (and coal too). NYS has tremendous forest resources that if harvested sustainably, could help offset dependence on foreign oil and the environmental impact of mining and drilling for fossil fuels. However, most American-based biomass devices are more polluting and less efficient than the fuel burning devices that they replace in all sectors. In the residential sector, wood burning is the largest NYS source of fine particulates. Fine particulates and chemicals that condense to form fine particulate aerosols (e.g., NO_x and SO_x) are damaging to human health and the environment. We cannot afford to compromise human health and NYS' attainment with more restrictive air quality standards just because we have forests that need to be managed.

NYS needs to be an American leader for clean, highly efficient biomass combustion. When smoke is observed coming from an outdoor wood boiler or home fireplace/wood stove, it translates to lost heating value and health impacts downwind.

At schools, where there are great pressures to reduce energy costs and simultaneously reduce asthma incidence among student populations, emissions from school biomass boilers should strive to be less than the emissions associated with the fuels that they are replacing (e.g., No. 2 Fuel Oil).

The next NYS Energy Plan should establish high efficiency goals, very low emission standards, and sizing guidelines so that biomass boilers are not oversized (which results in increased idle periods and pollution). Testing of units should represent real-world, in use conditions. For example, the current test method for outdoor wood boilers (OWHH-Method 28) does not represent conditions of actual use. Instead the method optimizes combustion conditions and gives mis-leading emission results. People across NYS are suffering from pollution from their neighbor's outdoor and indoor wood boilers, as well as, inefficient wood stoves/fireplaces. Some people are saving money on their heating bills by burning wood, while their neighbors are spending more on health care costs due to smoke health effects and they cannot enjoy their property.

Europe has been a leader in advanced biomass combustion for over 30 years. NYS needs to follow Europe's lead and advance biomass combustion technology so that our sustainably harvested forests can provide heating needs in a renewable, efficient, and low polluting way. We need to move away from inefficient, dirty biomass combustion in NYS.

Thank you for considering my tardy comment.

Judy Abbott