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number of studies concerning bio-mass and have cautioned against NY supporting any technology that emits a lot of pollution. We can not afford to get behind technology that is going to create other financial hardships for NYers which dirty technology most certainly can and will as evidenced by the disasters of nuclear power and wood boilers. Wind and solar should be #1 to grow a clean and healthy NY. IF NY is going to promote the use of bio-mass it MUST promote low polluting best technology. Currently 2% of the population heats with wood but contributes 13% of primary Particulate Matter. NY must pass an emission standard and ONLY promote bio-mass that is at a minimum no more polluting than oil (.07 g/hr) if we are to ensure we are not further contributing to climate change, black carbon, and health issues. There is a Fuels for Schools Program that is already causing problems for children by increasing their exposure to particulate thru the use of often over sized inefficient wood boilers. NY needs to relook at this program and ensure we are not condemning our children to respiratory problems. Most important is the "right" sizing of any installations which has NOT been done in VT and perhaps also not in NY. Those who sell the systems are interested in selling the biggest device, not necessarily the most efficient or lowest polluting. Currently 1 in 11 NYers have asthma. We must educate and protect the public with any NY Energy Plan. NYSERDA has done studies requiring water storage w/bio-mass. Will this in fact get us emissions that are safe? NY's Energy Plan should also focus on conservation. Upgrades to insulation and furnaces could save NY a lot of emissions and resources. NYSERDA has many programs to promote upgrades, but the monies should be more targeted to have the largest impact. The State Comptroller should also look at the Consultant fees which are often 1/3 of any grant awarded by NYSERDA. Also in regards to conservation, NY needs to put into place the retiring of outdated highly polluting devices. For example, when the EPA passed regulations for cleaner wood stoves, NY should have required as homes are sold old polluting wood stoves were retired. We must provide incentives for these types of upgrades to reduce our carbon output. The disaster of Outdoor Wood Boilers has underlined the need for STRICT NYS Laws to protect NYers from unscrupulous manufacturers. Rural NYers will be most subjected to any move "forward" w/the use of bio-mass and as it stands now in NY there is very serious environmental justice issues when it comes to wood boilers. Those living downwind of boilers that DEC has stated violate current laws are receiving no relief. WE must remedy this AND use only testing of any new bio-mass w/real world data ---not averages, not OWHH Method 28 test w/kiln dried red oak. NY needs to lead with education and smart technology. I am not convinced that bio-mass fits that bill. Please

The NY Energy Plan includes discussion of bio-mass. NYSERDA has done a

Comment:

consider health and carbon emissions with any steps forward. Solar, wind and water can take us a long way with less "down sides."