



Working with you to protect the environment of Berkshire County and beyond

March 21, 2008

Ian A. Bowles, Secretary of Environment and Energy
Attn: MEPA Office
Briony Angus, EEA No. 13635
100 Cambridge Street, Suite 900
Boston MA 02114

RE: EEA# 13635 Russell Biomass, LLC

Please accept these comments from the Berkshire Environmental Action Team (BEAT) on the Final Environmental Impact Report (FEIR) for Russell Biomass, LLC.

Please find that the FEIR does NOT adequately and properly comply with the Massachusetts Environmental Policy Act (MEPA). The FEIR does not provide enough information to ensure that this facility is the best use of our renewable resources, both wood and water, with the least environmental harm.

BEAT believes that the MEPA office should ensure that all state permitting for this facility, considers all the environmentally relevant information brought forward during the MEPA process. The draft Water Management Act permit (application #: 9P2-1-04-256.04) should be withdrawn and resubmitted, informed by the MEPA process.

Process:

BEAT is unclear on how a draft Water Management Act permit (application #: 9P2-1-04-256.04) was allowed to be issued without being informed by the MPEA process. From the about MEPA webpage: **“MEPA review occurs before permitting agencies act, to ensure that they know the environmental consequences of their actions.”** BEAT believes that the draft permit does not protect the Westfield River from over withdrawal by this facility.

Alternatives analysis:

BEAT believes that the state should develop a state-wide energy plan to determine the best kinds and locations of energy facilities to produce our needed energy with the least environmental impact. Instead we are viewing each new facility in a vacuum, without considering ALL the alternatives.

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What will the efficiency of this proposed facility be? Is burning wood to produce electricity the best use of our precious renewable resource? Are there more efficient ways to produce the same amount of electricity with far less release of GreenHouse Gases? Wouldn't that wood be put to better use to heat homes and businesses? If this facility did go forward, what absolute guarantees are there that the facility would burn ONLY sustainably harvested wood? And beyond all of that, if a wood burning biomass facility is desirable, is this the right location? BEAT does not believe so.

The Massachusetts Department of Environmental Protection (DEP) acknowledged in their draft Water Management Act permit that using air-cooled technology is technically feasible. In an age in which weather is becoming less and less predictable, droughts are occurring across the country, and in some locations severe droughts are causing a widespread wish that there had been better control of water withdrawals before those areas reached that point; it seems foolish not to require air-cooled technology. There is no good reason to allow a new power plant to contribute unnecessarily to both increased water withdrawal from the ecosystem, and sending large amounts of water vapor into the atmosphere.

The Westfield River had Atlantic Salmon return and make a redd (nest). What a great success. But an even greater success is the involvement of schools, such as the Becket-Washington Elementary School, in the Atlantic Salmon Egg Rearing Program (ASERP). I filmed the students learning about, not only Atlantic Salmon, but also what it takes to keep our ecosystem in a condition that supports these wonderful fish. These 3rd grade students were able to tell me in their own words how important the trees shading the river are, how the insect larvae in and among the rocks provide food for the fry, and how important clean, plentiful water is to everyone – including the salmon. How do we explain to these students that we would consider allowing this facility, which does not need to use all this water, deplete the river just to save money?

Water withdrawal:

In addition to the violation of required process of waiting for the MEPA process to be complete before issuing any state permits, BEAT is appalled that the draft Water Management Act permit appears to use the lowest flow that was ever recorded for this river as the target for minimum flow. This is not an environmentally sound methodology!

Again, please find that the FEIR does NOT adequately and properly comply with the Massachusetts Environmental Policy Act. The FEIR does not provide enough information to ensure that this facility is the best use of our renewable resources, both wood and water, with the least environmental harm. Thank you for considering our comments.

Sincerely,

Jane Winn, Executive Director