

April 8, 2009

Secretary Ian Bowles, EOEEA
100 Cambridge St Suite 900
Boston MA 02114
Attn MEPA Office: Nicholas Zavalas
(also by email to : Nicholas.Zavalas@state.ma.us)

Dear Mr. Zavalas:

Re: Pioneer Renewable Energy ENF, EOEEA #14388

I strongly urge the MEPA Office to require at least a Single EIR for this important project. Although it is presented by the proponent as a simple project not requiring an EIR, there are in fact serious questions regarding its impact on the natural resources of western Massachusetts, a region that is in danger of becoming an energy colony for the state. This letter focuses in particular on the demand it will put on Massachusetts forest resources.

The 47 MW plant requires 400,000 “green” (wet) tons of wood a year proposed in the ENF to come from “clean biomass residue from approved forest management operations” in five different states—presuming that all five states have “strict state regulations aimed at protecting the environment and ensuring the sustainability of supply,” a theory that is not proven. The ENF also presumes that the states outside Massachusetts have no other plans for their wood. The studies discussed below therefore generally focus on available western MA wood. The fuel is described as forestry residues, urban wood residues, land conversion residues and mill wastes. A study done for DOER in 2007 states that most sawmill residue is already spoken for and points out that land conversion products are not sustainable and should not be counted because the land is not to be returned to forest status. The “forestry residue” is mostly slash, which should remain on the forest floor. Urban wood residues contain Construction & Demolition debris, the burning of which is currently banned in this state.

A series of studies done for the DOER* indicate that, although there may be more wood growing than is being harvested, there are realistically less than one million tons of green wood “available” for annual burning. This figure is discussed in detail in the Kelty, D’Amato and Barten study (Jan 2008) prepared for DOER and DCR entitled “Silvicultural & Ecological Considerations of Forest Biomass Harvesting in Mass.”—the only one of the studies directed at the ecological impacts of large-scale harvesting. We believe this figure is far too high and we are prepared to demonstrate why. Taken at face value, however, the consensus figure of 1 million tons found in these studies would be **TOTALLY EXHAUSTED BY THIS GREENFIELD PLANT TOGETHER WITH THE PROPOSED HULL PLANT IN RUSSELL**. This would leave nothing for the mills, the landowners and any other plants that might want to compete. Since the state has no law or regulation limiting the amount of cutting, the result of exhausting this “surplus” would certainly be rampant overcutting in private forests and extreme pressure on the state forests and parks, already presumed capable of producing more than half of the desired tonnage. DCR does not currently have any cap on cutting.

The EOEEA and the DOER will deeply regret letting themselves be painted into this corner. A MEPA EIR would offer a real opportunity for discussing the physical facts and the policy options behind the biomass choice. An EIR would also offer a chance to discuss why and under what circumstances the huge immediate releases of CO₂ from five biomass plants can be considered “carbon neutral,” a subject of very large disagreement in this part of the state.

MEPA is the only “big picture” agency in the state. Your job is not to second guess the regulatory agencies but to provide a better and broader view of the cumulative impacts and future impacts of projects that may “seem like a good idea at the time.” I urge you to exercise this parental function on this proposal.

Sincerely,

Alexandra Dawson

*MA Biomass Energy Working Group, “Woody Biomass Supply in MA,” 2002

Innovative Natural Resource Solutions, “Biomass Availability Analysis—5 Counties of Western MA” 2007

Kelty, D’Amato & Barten (U MA), “Silvicultural and Ecological Considerations of Forest Biomass Harvesting in Mass,” Jan. 2008