

Dear Mr. Zavolas:

Regardless of the legitimate concern over climate change and the need for renewable energy, the proponent's description of this project as "simple" is inaccurate. The potential impacts on the water, air and forest resources of this part of the Commonwealth are in fact major and significant. I believe it is imperative for the MEPA office to require a full EIR for this important project to fully assess all impacts and assumptions contained in the ENF. Surely we are not in such a panic to produce additional energy that we can not afford sufficient time to ensuring that the facilities are properly sited with minimal damage to the immediate surroundings and maximum protection to all environmental values. "Conservation first" should be the motto along with efficiency. The alternatives must be examined along with the effects and supposed gains on all aspects of the environment.

I take this opportunity to remind you and the Secretary that 30 some years ago, the "only" solution to Boston's water supply needs was the proposed diversion of the Connecticut River--again looking to western Massachusetts to solve the problem. Once the suggestion to look for and fix leaks was enacted, lo and behold, there was plenty of water. I seriously ask you to fix the leaks here first before assuming we must have biomass plants and other destructive "renewables" all over the map.

Even to my admittedly inexpert eye, this project looks suspiciously more like a money making scheme for a few than it does an answer to the enormous environmental and energy problems we face. Given the magnitude of the need to replace fossil fuels with clean energy, I can in some measure sympathize with the apparent goals of the proponents and supporters for this project. However, to forego careful scrutiny of the effects upon the environment, particularly the state's forests, is wrong headed and might well create more problems than it solves if the plant is allowed to move forward without thorough study and evaluation of the costs and benefits to the overall environmental picture.

As I understand it, there may well be insufficient wood products to support the plant and questions remain unexplored and unanswered as to the ecological impacts to the forests themselves from removing nutrients and the environment generally from removing carbon sequestering trees in huge numbers. Since other plants are proposed in Russell and elsewhere, a key question appears to be whether the tons of wood needed are indeed available to keep these plants in operation for very long before resorting to C&D waste as an additional component of the mix. After the trees are gone, then what? Will DCR and private landowners simply be permitted to cut without limit? What does that do to the habitat values and water quality and all other values? I am unaware of any evidence that suggests that "sustainable" forestry as the term is understood by responsible foresters can be accomplished and still provide sufficient wood for all the plants currently proposed

within a 50 mile radius--the recommended distance to minimize transportation costs. Even the most casual observer would be moved to question the presumption that these plants can be managed sustainably without denuding all of western Massachusetts and portions of adjacent states! Indeed, other states and various owners may well have other plans for their wood. Someone must take a step back and do a reality check on the calculations. I would appreciate the MEPA unit being a responsible public agency responsive to the long term needs of the public lands, public health and public welfare.

A MEPA EIR would provide the opportunity for real discussion and debate of the energy policies and the cumulative impacts that are evolving for biomass and other alternative facilities--although why huge immediate release of CO2 are considered "carbon neutral" is another question that must be answered satisfactorily before any more are permitted. I for one would welcome a focused discussion of the need to actually conserve and remove polluting sources from the energy grid and to rein in cumulative impacts rather than simply adding willy nilly to them.

Sincerely,

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