

April 15, 2009

Secretary Ian A. Bowles  
Executive Office of Energy and Environmental Affairs  
ATTN: MEPA Office  
Nicholas Zavalas, EOEEA #14388  
100 Cambridge Street, Suite 900  
Boston, MA 02114

**RE: EOEEA #14388, Pioneer Renewable Energy, Greenfield**

Dear Secretary Bowles:

A comprehensive Environmental Impact Report (EIR) is needed for the above-referenced project, which on the face of things, is ill-advised.

We Don't Need It – we have enough power to satisfy demand, according to recent data. Recent reports indicate that additional power is not needed.

We Don't Want It – all the negative impacts -- including but not limited to deforestation, water consumption, deteriorated water quality, air pollution, as well as increased carbon dioxide emissions just when we don't need them – aren't worth it and are unacceptable.

We Can't Afford It – aside from being asked to absorb all the negative environmental impacts, rate-payers would be asked to pay at least three times as much as they need to for biomass energy. According to a 2007 Massachusetts Department of Energy Resources document (Massachusetts Saving Electricity: A Summary of the Performance of Electric Efficiency Programs Funded by Ratepayers Between 2003 and 2005), conservation is the cheapest form of energy, costing only 3.5 cents per kilowatt-hour, and furthermore, untapped opportunities for conservation are substantial. And conservation has positive rather than negative environmental impacts, including reduced carbon dioxide emissions. Why on earth would we want to go with energy from biomass that costs at least three times as much as alternatives and has severe negative impacts to boot?

State regulatory agencies need to go back to doing their job of looking out for the interests of the public rather than looking out for the interests of slash and burn proponents. They need also to come to grips with the need to move away from combustion for energy generation (and waste disposal) to carbon-free energy sources. Toward that end, an EIR should be required, and furthermore, it should be reality-based and science-based rather than faith-based.

For example, an honest carbon footprint analysis should be done that takes into account all relevant carbon sources and sinks – including but not limited to energy needed to cut, chip, and haul trees; energy needed to build and operate the facility; and impacts to carbon sequestration

services provided by trees -- rather than repeating the mantra that biomass is carbon neutral. It most certainly is not carbon neutral. In addition, the EIR should look at the impacts of this proposed facility in the context of the various other incinerator projects that exist or are currently being proposed. Air emissions should be based on site-specific worst case scenario meteorological data, realistic assumptions about fuel quality, and the total air pollution burden that would result. The total air pollution burden is equal to currently existing pollutant levels plus pollution from the stack plus pollution from the trucks plus pollution from any other sources associated with the project. This is what people would breathe. Lives are literally at stake, so this is no time to pretend that the starting point is pristine air quality or that we can look separately at one aspect of air pollution at a time without ever adding them up.

Furthermore, comments on the ENF and EIR should actually be seriously considered and factored into the analysis rather than simply being dismissed as in the case of the scandalous ENF/EIR process for the proposed Russell Biomass project. Significant flaws in analysis methodology were pointed out by numerous people commenting on the Russell Biomass ENF/EIR, and DEP simply dismissed them and allowed the original flawed methodology to be used.

President Obama has said that he will return to using science as the basis for decision making on the federal level. We need to return to relying on science on the state level as well. A comprehensive, thorough, and realistic EIR should absolutely be required for this proposed project.

Sincerely,

Ellen Moyer