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COMMISSION

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August 16, 2007

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MEPA

Mr. Ian A. Bowles, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Attention: MEPA Unit

Reference: Review Comments on the Draft Environmental Impact Report and Notice of Project Change for the Russell Biomass Power Plant Project on Station Road in the Town of Russell, Massachusetts, EOE # 13635

Dear Secretary Bowles:

The Pioneer Valley Planning Commission (PVPC) has the following review comments on the Draft Environmental Impact Report (DEIR) for the above-cited project. The proposed project involves the construction of a 50 MW Biomass wood fuel power plant at the abandoned former Westfield River Paper Company site in the Town of Russell. Of the seventy-acre parcel owned by Westfield Paper Lands, LLC, twenty acres will be subdivided for use by Russell Biomass LLC for the proposed biomass power plant. A total of 5.3 miles of transmission line will need to be constructed within an existing easement in order to connect this plant with the existing 115 kV electrical grid.

#### Land Use Comments

PVPC staff have reviewed the DEIR pertaining to this proposed development with regard to general environmental considerations and under the terms of *Valley Vision 2*, the currently adopted regional land use plan for the Pioneer Valley Region. *Valley Vision 2* identifies this parcel as Existing Developed Land, Land Suitable for Protected Farmland, Land Suitable for Low Density Residential Uses with Appropriate Environmental Protections, and Land Suitable for Protected Open Space. This proposed development is consistent with *Valley Vision 2* for the following reasons: *Valley Vision 2* encourages the use of renewable energy; the proposed project is located on land that was previously developed for industrial use; and an existing Brownfield site will be addressed and redeveloped.

The PVPC continues to support the Commonwealth of Massachusetts' commitment to increasing production of renewable energy in an environmentally sensitive manner. All energy sources have impacts on the environment—impacts that are of different scales and duration. Renewables can have impacts on biodiversity, landscape, transportation and air quality. The challenge is to find practical ways to use and take advantage of renewables that have less impact than the traditional fuels on which society currently depends. With this said, the environmental concerns raised in our October 20, 2005 letter on the EENF have been addressed and the following are our additional comments based upon the contents of the DEIR.

1. Fuel Storage Management Plan

The proponents clarified the definition of “wood fuel” as part of the Notice of Project Change. Section 12.3.4 states that fuel storage management will be in compliance with the State Board of Fire Prevention Regulations and the National Fire Protection Recommended Safe Practices for Forest Products. It is recommended that a detailed fuel storage management plan be included in the Final EIR prepared for this proposed project.

2. Stormwater Management

The project will implement erosion and stormwater management controls in compliance with the Massachusetts Department of Environmental Protection’s Stormwater Policy and the applicable NPDES for the proposed power plant site and associated transmission line. It is recommended that a gate valve be installed prior to detention/infiltration areas. Runoff is being collected from the fuel storage areas as well as all paved surfaces. Consequently, there is a potential for a release of hazardous materials in these areas. The stormwater system should have the ability to isolate these areas from discharging to the Westfield River, or into the ground, in the event of such a release.

3. Water Withdrawal and Discharge

Proposed withdrawal volume is not anticipated to impact river flows or aquatic species at 4% of the 7Q10 flow and 2.5% of the 50% August median flow. Also note, there are slightly conflicting figures regarding August median flow within the report: Section 10.4.1 states 1.3% of the August median flow; Table 3-3 states 2.5% of August median flow. We suspect this is probably an editing oversight. The NPDES discharge permit will also identify discharge limitations to meet water quality standards and to protect designated uses for the downstream river segments.

Section 11 describes the discharge outlet for process wastewater and stormwater with a bank discharge on a natural stone pad of the same stone as the existing substrate. The DEIR indicates that discharge water quality will meet the Water Management Act and NPDES thermal and chemical standards. We’d urge that the aesthetics for this system blend with the surrounding environment to the maximum extent possible. Although the existing National Wild and Scenic designation of the Westfield River ends approximately 2.5 miles upstream of this project, the lower segment of the river is heavily used for recreation. Moreover, although this project itself encompasses the redevelopment of an identified brownfield site, it is nevertheless important that the project design attempts to integrate in the natural landscape to the maximum extent possible.

The applicable segment of the Westfield River (i.e. Segment MA 32-05) is classified as a Category 5 Water on the Commonwealth’s 2006 Integrated List of Impaired Waters, and it therefore requires a TMDL for known impairments to this segment of the Westfield River inclusive of taste, odor, color, turbidity, and noxious aquatic plants. Given this, it is recommended that the project proponent work with Massachusetts DEP to develop a TMDL prior to the issuance of any required MEPA certification. This will help to ensure that this project will not contribute further to known impairments of the Westfield River.

4. Rare Species

The proponent is working with the Natural Heritage Endangered Species Program (NHESP) to develop mitigation strategies for aquatic species at the site, downstream and along the corridor of the transmission line cited above. Some species surveys are on-going through the summer and it is therefore premature to determine if a "take" is unavoidable. The proponent will need to continue to coordinate with NHESP officials as the surveys are completed so as to mitigate adverse impacts to protected species. Similarly, the development of the Right-of-Way Vegetation Management Plan and Yearly Operational Plan for the utility easement should also be coordinated with NHESP officials on a yearly basis.

The proposed Off the Road Vehicle (ORV) management plan should explicitly state that the proponent will be responsible for paying the cost required for the increased policing and patrols needed annually. Illegal motorized use is a problem throughout western Massachusetts which the local police and the State environmental police do not have sufficient funding nor staff levels to deal with. It is therefore highly recommended that the proponent coordinate its ORV management plan with the surrounding communities so that they may participate in the development and implementation of a much needed sub-regional solution to this problem.

5. Hazardous Material Management Plan

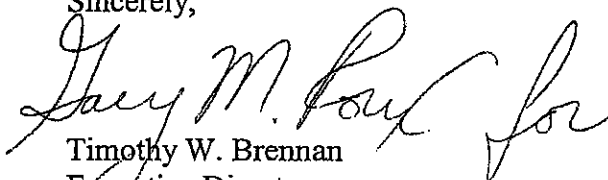
A Hazardous Waste Management Plan has not been developed given that the project is still under design. Section 14 of the DEIR describes the components that will be addressed in this plan. It is recommended that the plan be completed prior to issuance of any required MEPA certification.

Transportation Comments

We would like to reiterate our previous request for a study on the feasibility of using existing rail service to the facility as a means to mitigate the proposed truck traffic impacts to the Town of Russell and the surrounding roadway system. The proposed site is adjacent to the CSX Main Line and was previously served by rail. It, therefore, represents one of the regions few rail served industrial sites. Estimates of the cost to rehabilitate the existing rail structure at the site and information on the cost of rail service compared to truck shipping costs should be included in the Final Environmental Impact Report.

Thank you for the opportunity to offer our comments on this proposed development.

Sincerely,



Timothy W. Brennan  
Executive Director

cc: R. Sherer, Tighe & Bond, Inc.