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## 9/20/2006

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To Whom It May Concern:

I write petitioning to participate in the case of petitioner Russell Biomass LLC, Docket # 06-60. I petition to participate as an individual concerned about the river that borders his own hometown, and who does inhale the same pocket of air that people in Russell do.

It is in accordance with G.L. c. 164, § 69H, that the Siting Board has requirement of implementing energy policies in its statute to provide a necessary energy supply for the Commonwealth with a minimum impact on the environment at the lowest possible cost.

With regards to the petition of Russell Biomass LLC detailed in docket # 06-60, the minimum impact at lowest possible cost is not, I believe, achieved in the proposed facility's present design. Presently, many concerns exist regarding its design in terms of both air pollutant output and impact on the Westfield River. Furthermore, my strong belief is that the petitioners can in no way demonstrate that additional energy resources in fact are needed given how state energy needs are not only met – but exceeded – by fewer than even the resources available at present if stringent energy conservation measures are pursued by both the Commonwealth and the various municipalities within the state.

The applicant must demonstrate that this very low megawatt facility proposed actually meets a need that does not in fact exist. The applicant must furthermore demonstrate that this proposal is better than alternative approaches to meet this fictitious need in terms of cost, supply reliability, and environmental impact. Regarding environmental impact in particular, these – my written comments – have that intent of demonstrating that alternative approaches would in fact have a far superior performance in minimizing the proposed facility's environmental impact. Russell Biomass LLC has opted not to pursue these far superior means of minimizing such impact in its proposed facility design.

Sadly, given how the Siting Board has amply demonstrated already many times its reliance on peak load forecasts rather than forecasts of the impact of energy-saving technologies and practices in its determination of need, I do realize that my own argument that no need indeed exists for this proposed facility's proposed energy output shall likely fall on deaf ears. The Siting Board has amply demonstrated throughout its

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history clear determination to base need on the most wasteful of practices in place as opposed to reflecting in its determination the wise use of conservation technologies. Thus, the Siting Board bases determination of need not on genuine energy consumption need, but on wasteful energy demand encouraged by the Siting Board's cavalier disregard for how demand does not in fact dictate true need but reflects wasteful use and habits.

My comments herein shall therefore be limited to the question of facility mitigation of environmental impacts. The Westfield River, river basin and watershed is a truly rare, precious natural resource host to several threatened and endangered species – several of which I do believe at risk and very much placed in jeapordy by the proposed facility's present design, a design that would facilitate the draining of up to 17% of the river's volume in times of drought and the discharge of heated waters into the river. The region's air quality, furthermore, has attracted national attention as a genuine health risk that the release of pollutants from the proposed facility could not help but exacerbate.

I wish also here to remind the Siting Board that, in its decision approving of the siting of the Berkshire Power Development LLC power plant in the Town of Agawam, it did agree with the Berkshire Power Development LLC finding that biomass technologies had "uncertain" potential to meet the manufactured and fictitious need at reasonable cost.

The water supply that would be consumed in cooling is excessive and detrimental to river health, while the disposition of heated waste water discharge poses a genuine threat to fish hatcheries, the salmon restoration project, and temperature sensitive species. Other cooling technologies exist that Russell Biomass LLC could employ that would not so tax river health, and would reduces plumes and ground level fog and icing of roads.

I should also note that specific emission control systems must be specified. The proposed design has potential of emitting over 1600 tons of known pollutants per minutes. I do not believe emissions stacks shall pierce the thermal inversion layer, despite this being an area renowned for terrible air quality. Located so very near several abutters and a school, the proposed power plant poses a genuine and severe health risk to many human lives. The particulate matter this proposed plant would emit shall penetrate lung tissue.

Furthermore, the proposed power plant as presently designed would not employ the best available technologies for both pollution reduction and efficiency. Pyrolesis gasification is apparently not being at all considered by Russell Biomass LLC for reasons the elude me. Please accept my petition to be named an interested person in this case.