



January 16, 2010

New Hampshire Site Evaluation Committee
Department of Environmental Services
29 Hazen Drive
Concord, NH 03302

ATT: Commissioner Thomas Burack

RE: SEC Docket 2009 – 02

Dear Commissioner Burack and Committee Members:

On behalf of the New Hampshire Sierra Club (NHSC) and its 4,000 members in New Hampshire, I respectfully request the Site Evaluation Committee to deny the Laidlaw Berlin Biopower, LLC application for development of the 70MW power plant.

There are a number of environmental concerns with the application that impressed NHSC to urge the Committee to deny the application. Please find a few listed here.

Forest Resources

- The application states the use of locally harvested trees but vaguely implies the use of other low grade biomass supplies. The details of those other supplies are needed, including, but not limited to, the definition of the other “low grade biomass”, the transportation plans and the sources of this biomass.
- The fuel strategy ignores other users of the wood supply and creates a virtual monopoly over the wood suppliers, an entirely unacceptable and undemocratic system of operation.
- The fuel strategy ignores the inherent fragility of external economic impacts that have increased costs to ratepayers in the recent past, such as fluctuations in transportation costs and decreases in electricity demands. Diesel fuel prices will have an immediate effect on the operating costs. Additionally, just last year in

The Sierra Club's members are 700,000 of your friends and neighbors. Inspired by nature, we work together to protect our communities and the planet. The Club is America's oldest, largest and most influential grassroots environmental organization.

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2009, a rate increase request by Public Service Company of New Hampshire was based on lower demand for electricity caused by higher efficiency and thrift on the part of their customers.

- The application claims support for sustainable forestry but the details are vague or simply absent at a time when there are increased demands on the diminishing natural areas in the Northeast.
- The LandVest study does not actually address sustainability practices; rather it is a practice in number crunching. Instead the study, without reference to data, assumes that the forest waste for use at the proposed facility would be 70% rather than the accepted industry standard of 50%. The study fails to establish sustainability plans.

Climate Change Pollution

The application claims that by virtue of burning wood that the facility will have an overall positive impact on global warming pollution. However, a closer look will show otherwise.

- There is no analysis or attempt to calculate the carbon footprint of this facility or the associated business, namely the daily vehicle miles traveled to deliver the wood.
- The application states that there will be 100-120 trucks per day, 7 days a week between the hours of 6AM to 9PM.
- The application details a transportation radius of a 100 miles or 3 hour drive time by truck. The long distances burn more diesel fuel. The increased diesel fuel use produces more carbon pollution very quickly neutralizing the positive returns of burning biomass.
- The efficiency of the facility is very low and there are no stipulations to increase it with district heating/cooling or cogeneration or something similar.

Air Pollution

Particulate emissions, such as dust, soot and ash, are of special concern as it is directly linked to special populations with breathing problems in the area and the North Country's tourism and economic development.

- The applicant does not provide adequate control of the wood processing and storage. The open air or outside wood processing and storage will not adequately control the resulting dust and does very little to describe additional plans to reduce the dust.
- The proposed facility is in downtown Berlin near residential and municipal buildings and the City is intent to shift the focus of downtown away from industrial projects to more civic and tourism pursuits. The impacts of the

proposed facility on air quality and the quality of life are inconsistent with the promotion of these tourism goals.

Toxic Pollutants

- The location of the proposed facility includes a toxic waste dumping area, including the neurotoxin mercury, very close to the banks of the Androscoggin River. The Committee must remember that the State of New Hampshire relieved the former owner and all future owners of the clean up liability. It is in the best interest of the State and the citizens that there is full cooperation to monitor and dispose of the waste carefully and thoroughly.
- The application only describes lining the drainage systems to prevent the toxic pollution from contaminating the Androscoggin River. There seems to be an assumption that the waste will leak into the river and associated watershed.
- Comprehensive monitoring of the toxic waste is needed to protect the community.

Thank you for your consideration and please put me on the Service List.

Sincerely,

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