



January 11, 2007

Ian A. Bowles, Secretary
Executive Office of Environmental Affairs
100 Cambridge St., Suite 900
Boston MA 02114

Attn. Nick Zavolas, MEPA Office

**Subject: OAR Comments on Environmental Notification Form
Billerica Power; EOE #13925**

Dear Secretary Bowles,

On behalf of the Organization for the Assabet River (OAR), thank you for the opportunity to review and comment on the above ENF for the Billerica Power Project. OAR is a membership organization representing approximately 900 households and businesses in the Assabet watershed. Our mission is to protect, preserve, and enhance the Assabet River, its tributaries and watershed. Our program includes the Concord River on which this project is located.

We understand that due to exceeding land, water and energy thresholds this project will be the subject of an Environmental Impact Report. Accordingly our comments relate to the scope of the EIR. We are primarily concerned that the project could have a detrimental impact on the flow, water quality and/or recreational value of the river. Although located in an industrially-zoned area, the ENF incorrectly states that the project is "surrounded by industrial uses". In fact, the project site has a significant riverfront border. Although industrial uses are on either side of the project, the riverfront of all properties in the area is in its natural state. Additionally, the Concord River is now primarily a recreational river and some of the existing industrial uses may not be there indefinitely. The EIR should contain renderings and descriptions of the appearance of the facility, including the stacks and screening vegetation, to ensure that the view from the river is not impaired. The site plan proposes to keep the power plant near the railroad tracks at the opposite end of the property, which we support. A conservation restriction should be considered for the riverfront area.

Perhaps the most significant aspect of the proposed project is the use of water for cooling. Nearly 1 million gpd may be needed in total. OAR strongly supports the alternative of using treated wastewater from the nearby wastewater treatment plant rather than boring wells to supply groundwater. This is in line with statewide efforts to re-use wastewater in industrial processes and reduce the stress on aquifers and rivers. If this alternative is not pursued, air cooling should be used rather than groundwater or river water withdrawal. If well water is still to be considered, the impact on groundwater and base flow to the Concord River should be quantified, and any well should be located as far from the river as possible.

The ENF does not describe the power plant's cooling process, which should be fully explained in the EIR including: how much water will be used and during which months, losses in the cooling process, the temperature of the used cooling water and where it is disposed of, what additives the cooling water may contain and alternatives to those additives if they may affect river water quality. Since the Billerica wastewater treatment facility discharges to the Concord River, any additives in cooling water returned to the treatment plant could affect levels of pollutants in the treatment plant's discharges. The impact of cooling water being discharged to the Concord River should be modeled for thermal pollution.

We are also concerned about possible contamination of groundwater or surface waters from oil spills. The design of stormwater BMPs should be such that any spills will be contained on site and contaminated areas remediated immediately.

Thank you for considering our comments. Please call me or Alison Field-Juma, OAR's Policy Director, if you have any questions concerning this letter.

Sincerely,

Forsyth P. Kineon
Executive Director

CC: Billerica Conservation Commission
Billerica Planning Department
Mass. Division of Fisheries and Wildlife
Mass. Riverways Program