

BOARD OF HEALTH



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June 29, 2009

Secretary Ian A. Bowles
Executive Office of Energy and Environmental Affairs, EOEA NO. 14017
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Proposed 350 Megawatt Electric Generating Station, Oak Hill Way, Brockton, MA.

Dear Secretary Bowles:

The Brockton Board of Health vigorously supports James E. Harrington, Mayor of the City of Brockton and the vast majority of the eleven elected City Councilors in their opposition to the siting on Oak Hill Way of a 350 megawatt gas fired electric generating station proposed by Brockton Power Company LLC. Our support for the opposition of this proposed generating station is based on the following:



1) The PM 2.5 three year average (background) for the years 2004, 2005 and 2006 was an astounding high of 29.6. with the new data recently obtained from DEP for the year 2007, the three year average increases to 30.7, which is an 87.7 percent background of the current National Ambient Air Quality Standards. This office, in conjunction with the Massachusetts Department of Public Health, Bureau of Environmental Health, have one day readings of PM 2.5 of 31.0 taken on the grounds of the Gilmore Academy, which like the Davis Elementary School is in very close proximity to the proposed site.

These high existing readings of PM2.5 particulate matters in themselves make the area of the proposed power plant an existing proverbial "hot spot of pollution". These high readings coupled with an increase of PM 2.5 associated with the proposed power plant bring the PM 2.5 readings almost to the Environmental Protection Agency's maximum limit of 35. There also exists a strong possibility that both in theory and in practice that the maximum 35 level could be breached.

2) According to the Massachusetts Department of Public Health and the Massachusetts Asthma Advocacy Partnership, Brockton has been highlighted as one of six urban areas in the state with higher than state averages of pediatric asthma and asthma related hospitalization. According to Brockton Power's own March 28th, 2008 14017 Final Environmental Impact Report (FEIR) the plant would increase the following pollutants into Brockton's and surrounding communities' air:

(2)

- 85 more tons per year (tpy) of particulate matter (PM)
- 109 more tpy of Carbon Monoxide (CO)
- More tpy of Sulfur dioxide (SO₂)
- More tpy Volatile Organic Compounds (VOC)
- 107 more tpy of Oxides of Nitrogen (NO_x)
- 1,134,000 more tpy of Carbon dioxide (CO₂)
- More tpy of Hazardous Air Pollutants (HAPs)

Additionally, the EOEEA ENF Certificate states, "The project exceeds an ENF Threshold for air and is located within five miles of an Environmental Justice (EJ) population." Schools such as the Davis, Gilmore and Trinity Academy, elderly housing and residential neighborhoods surround the proposed location on Oak Hill Way. Even were Brockton not deemed by the State to be an especially vulnerable and already taxed Environmental Justice Community, the confluence of children, elderly, schools and residential housing, all within close proximity to the proposed power plant site, poses an unnecessary and unacceptable risk to Brockton and its residents.

The plant would result in significant adverse impacts that cannot be mitigated.

3) Because of increases in scientific knowledge, this country has been able to produce technology that harvests natural energy from the earth and use it to power homes, cars, businesses and farms. These forms of energy are called clean or renewable because they use the sun, wind, water and earth to generate heat and electricity.

These new forms of energy have become the wave of the future since this technology has a significantly reduced impact on the environment and ozone when compared to current energy sources.

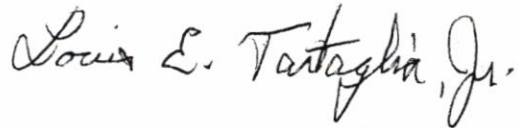
Clean or renewable energy is exactly what it seems; it is a natural resource that is renewable from light waves, water tides, and geothermal heat in the earth's core or air movements. When these resources are used, by products such as green house gases are eliminated and scientists believe that these resources can contribute to solving the problems of global warming and climate change.

The United States government is pressing for it to be more widely used over the coming decade.

4) While we are opposing the siting of this proposed power plant, the United States House of Representatives approved a landmark overhaul of U.S. environmental policy. Details of this Bill, in an effort to curb global warming, call for reducing greenhouse gases by 17 percent from 2005 levels by 2020 and 83 percent by 2050; limiting emissions from major industrial sources, including power plants; and controlling carbon dioxide from the burning of fossil fuels and limiting six other green house gases.

(3)

Sincerely,

A handwritten signature in cursive script that reads "Louis E. Tartaglia, Jr.".

Louis E. Tartaglia, Jr., Executive Health Officer
Brockton Board of Health
City of Brockton

1. (3) Excerpts from the National Association of Local Boards of Health
(NALBOH) Newsbrief, 2nd Quarter 2009, Volume 16, Issue

cc: Robert J. Shea, Presiding Officer,
Energy Facilities Siting Board