



Georgia Chapter

March 9, 2011

Brad Lofton
Executive Director
Valdosta Lowndes County Industrial Authority
2110 North Patterson Street
Valdosta, GA 31602

RE: Sierra Club position on the Wiregrass Energy facility

Dear Mr. Lofton:

Congratulations on the groundbreaking of your solar facility last month. The Georgia Chapter of the Sierra Club is very pleased and excited to see those types of clean, renewable projects coming online all across our state, after years of Georgia Power claiming that solar wouldn't work in our state.

However, I am writing to you primarily on a different subject as it has come to our attention that you continue to claim that the Sierra Club supports the Wiregrass Energy's proposed biomass facility. The truth is that this proposal would be the type that Sierra Club policy says needs to be evaluated on a case-by-case basis. That evaluation has not been done, and thus the Sierra Club is not supporting nor opposing the project.

If you read our full energy policy, you will learn that we think that there are environmental consequences to all types of energy generation, and thus, we like to support energy efficiency and conservation and make sure those are exhausted before any new generating capacity is built. As Georgia is ranked 37th in energy efficiency policy by the American Council on an Energy Efficient Economy, we think we have a long way to go, and are not convinced that this 40 MW addition to the ~12,000 MW of natural gas capacity that has been added over the last 10-12 years is really needed.

To be clear on where the Sierra Club is coming from in terms of the resources we prefer when new capacity is really needed, we prefer non-polluting alternatives, like on and off-shore wind, solar, and low-temperature geothermal. In the middle are energy resources that might be okay, and then there are the types we oppose, like coal and nuclear.

The policy you cite as our support is taken from our Biomass Guidance Policy (<http://www.sierraclub.org/policy/conservation/biomass.aspx>), which was passed in 2000 and is currently being updated. You rely on one section of the policy that deals with

Agricultural Waste, which doesn't address woody biomass specifically. The Narrative of your permit application states that "This boiler will be fired with clean woody biomass from forestry residue, mill residue, and clean urban wood waste; wastewater treatment plant sludge of approximately 0.5 percent of total heat input to the boiler...."

Our current Biomass Guidance Policy does not address the co-firing of several different fuel sources. However, if we look at them one-by-one, the wastewater treatment plant sludge is a non-starter, as our policy says that such a facility must be permitted as a waste incinerator rather than an energy facility, which this facility is not.

Our policy does address forest biomass:

"We oppose projects which rely upon ecologically destructive clear-cutting, in-wood chipping where excessive amounts of biomass are removed from the land, and conversions to non-native species which undermine native biodiversity. We oppose biomass energy production on any land which relies upon logging activities that are unsustainable, or that jeopardize fully functioning forest ecosystems. We also oppose biomass energy fuel production which interferes with ongoing restoration of ecosystems with native plants and animals, or with the reestablishment or protection of biological corridors to link isolated forest stands." There is no condition in the permit that would prevent the use of woody fuel sources that we find objectionable.

Furthermore, it is our experience that facilities request permit amendments that allow for a change in fuel or operating requirements based on market conditions, thus, we are concerned that the ratio of sludge could be substantially higher, or additional objectionable fuel sources could be added at a later time. We are also concerned about the PTE calculations that show many criteria pollutants approaching the 250 tpy threshold for a major source and that this facility was permitted as a minor source.

Finally, we do have policy that addresses siting of energy facilities <http://www.sierraclub.org/policy/conservation/energyfac.aspx>. It is not clear whether the process to site this facility meets with our policy, but understand it to be proposed for an area where the hazardous air pollutants could pose a problem for the community.

Since the public comment period has long since closed, we will likely not spend the resources to fully evaluate this project and either support or oppose it. As such, we would appreciate it if our position was no longer misrepresented on this issue by you or anyone on the Valdosta Lowndes County Industrial Authority.

If you have any questions or would like to discuss the matter, please feel free to give me a call at 404-607-1262 x224.

Sincerely,



Colleen Kiernan
Georgia Chapter Director

Cc:

Allan Ricketts, Assistant Director

Jerry Jennett, Chair

Norman Bennett

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