

Blue Ridge Environmental Defense League

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Administrator Lisa Jackson
United States Environmental Protection Agency
1200 Pennsylvania Ave.
Washington, D.C. 20640

Re: **Docket ID No. EPA-HQ- OAR-2011-0083**: “Deferral for CO2 Emissions From Bioenergy and Other Biogenic Sources Under the Prevention of Significant Deterioration (PSD) and Title V Programs: Proposed Rule”

Dear Administrator Jackson:

On behalf of the directors and members of the Blue Ridge Environmental Defense League (BREDL), a regional grassroots organization with members throughout the South, I am writing in opposition to the above referenced regulatory deferral of the application of PSD and Title V Programs.

Biomass incinerators are inundating the Southern United States. Companies large and small are grabbing for federal stimulus dollars and tax breaks, touting their new process as the answer to clean energy. The prospect of a three-year delay on these regulations is already leading to a rush to site and permit new biomass facilities, which will likely be grandfathered in and unaffected by new rules. This scenario will create *de facto* sacrifice zones in disenfranchised communities.

In North Carolina, poor communities of color are being targeted by biomass burning facilities. For example, in Hertford County, Hertford Renewable Energy is proposing to build a 60mw biomass-fired power plant. Hertford County is one of the unhealthiest counties in the state—ranked 91st—with 20% of its residents living in poverty². Additionally, 65% of Hertford County residents are minorities³. Sampson County, where Fibrowatt has a proposed chicken manure incinerator, is 47% minority, with over 20% of its residents living below the poverty level.⁴ Sampson County is also unhealthy—ranked 71st.⁵ Finally, in Montgomery County, Poultry Power USA has recently proposed a chicken manure biomass facility. Close to 40% of the county residents are minority, with almost 20% living below the poverty line.⁶

¹ [Hertford County Health Data](#)

² [Hertford County Census Data](#)

³ [Hertford County Census Data](#)

⁴ [Sampson County Census Data](#)

⁵ [Sampson County Health Data](#)

⁶ [Montgomery County Census Data](#)

If EPA does grant a three-year deferral, it is crucial to implement a moratorium for all facilities with “biogenic” carbon emissions that will fall under the exemption. Additionally, EPA must not allow existing biomass facilities to expand during this time, or be grandfathered from the greenhouse gas rules. The South has traditionally been the dumping ground of the nation. EPA is abdicating their responsibility to protect public health and the environment, thus enabling the biomass and waste industry to target poor and minority communities.

Sincerely,

Therese Vick

Community Organizer

Blue Ridge Environmental Defense League