

Blue Ridge Environmental Defense League

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U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585.

Re: DOE NEPA Implementing Procedures, RIN 1990-AA34
Docket ID: DOE-HQ-2010-0002
10 CFR Part 1021

On behalf of the Blue Ridge Environmental Defense League, I submit the following comments on the above referenced matter. In brief, we oppose the addition of categorical exclusions to implementation of the National Environmental Policy Act. Although some of the proposed changes may indeed be minor and worthy of further consideration, we oppose exclusions for projects which would themselves have negative environmental impacts, would lead to further categorical exclusions, or would actually undermine the technology thus exempted.

Of particular concern to us are new categorical exclusions in the following areas:

B5.13 Experimental Wells for Injection of Small Quantities of Carbon Dioxide
B5.16 Solar Photovoltaic Systems
B5.17 Solar Thermal Systems
B5.18 Wind Turbines
B5.19 Ground Source Heat Pumps
B5.20 Biomass Power Plants
B5.21 Methane Gas Recovery and Utilization Systems
B5.24 Drop-in Hydroelectric Systems

The above list is a mix of energy facilities, some of which are truly beneficial, others of which are not. For example, solar voltaic, solar thermal, and wind turbines I believe are generally beneficial. On the other hand, biomass power plants and landfill methane are either negative themselves or associated with other negative impacts.

The beneficial energy sources listed could be undermined by the proposed categorical exclusions because the affected public would see them as loopholes. The negative energy sources simply should not enjoy categorical exclusions. The conventional approach to biomass energy sources which labels them as "carbon neutral" is a mistaken concept without scientific basis; biomass energy source impacts are large and should not enjoy any categorical exclusion.

Thank you for the opportunity to submit these remarks.

Louis Zeller
Science Director

Esse quam videre