

### Appendix C -- Comments on the Draft EIS and RUS Responses

<b>Party</b>	<b>Comment Summary</b>	<b>Response</b>
Georgia Forestry Commission (GFC)	Commenter supports the development of the Proposal as described in the EIS.	No response needed.
Seminole Tribe of Florida, Tribal Historic Preservation Office	Commenter would like to be informed if cultural resources that are potentially ancestral or historically relevant are discovered during construction.	See Section 3.11.4 for potential mitigation plans regarding cultural resources.
U.S. Army Corps of Engineers (USACE)	Commenter recommends that formal wetland delineation be done before any work begins, and notes that a project that impacts more than 0.5 acres of U.S. waters needs to be evaluated under the Individual Permit Program, and mitigation will be required.	No response needed (these items are covered in the EIS).
Georgia Department of Natural Resources (DNR)	No additional comments.	No response needed.
Georgia Environmental Protection Division (EPD), Watershed Protection Branch	Commenter concurs with the Proposal provided that the project complies with all applicable State water permitting requirements.	No response needed.

<b>Party</b>	<b>Comment Summary</b>	<b>Response</b>
Michelle Callaway	<p>Commenter noted that residents near the plant use well water, and questioned how the Proposal's usage of water would impact this.</p> <p>Commenter expressed concern as to the odor of the plant, questioning whether it would be similar to an odiferous paper mill in the area.</p>	<p>As described in Section 3.4, when the plant is in operation, it will not use well water and there would be no impacts on nearby wells. However, during construction one excavation may need to be dewatered and there is a possibility that a well may be installed to supply water during construction. Testing would be done beforehand to make sure no wells would be affected. If any impacts to nearby wells did occur, and the impacts affected the water supply, Oglethorpe would be responsible for providing an alternative water supply.</p> <p>The biomass plant would burn wood, which is very different from the process of making paper. Odors associated with a paper mill would not be expected.</p>



P O Box 819  
Macon, GA 31202-0819  
P. 478-751-3500  
F. 478-751-3465

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H. G. Yeomans  
Swainsboro

May 2, 2011

Stephanie Strength  
Project Manager  
USDA Rural Development Utilities Program  
1400 Independence Ave. SW  
Room 2244, Mail Stop 1571  
Washington, DC 20250-1571

Dear Ms. Strength:

Please accept the attached comments from the Georgia Forestry Commission in reference to the draft environmental impact statement for Oglethorpe Power Company proposed facilities in Georgia.

The enclosed comments indicate that our agency supports these projects because of the increased value of forest products and anticipated increased reforestation and forest management investments resulting from their development. Our agency has worked with Oglethorpe Power Company to determine the proper locations for these facilities that will ensure long-term sustainability.

Thank you for the opportunity to provide comments and I would be glad to answer any questions regarding these comments.

Sincerely,

Nathan McClure  
Chief Forester Forest Utilization  
Georgia Forestry Commission

Attachment

## **Georgia Forestry Commission**

### **Comments in reference to Oglethorpe Power Corporation's Draft Environmental Impact Statement for Development of Biomass Power Plants in Warren and Appling Counties**

April 29, 2011

#### **General Comments:**

- The Georgia Forestry Commission (GFC) supports the development of these plants as described within the proposed EIS.
- The GFC has provided assistance to Oglethorpe Power Company (OPC) in identifying these locations within Georgia where forest sustainability is projected to be met or exceeded after development of new facilities using forest biomass.
- The GFC recognizes that increased markets for wood resources provide incentives for private forest owners to continue to manage woodlands sustainably and to invest in reforestation activities.
- The comments in the following sections apply to the general impacts of the developing facilities on the local communities, forests, and agency services. They do not apply to the specific site development activities.

#### **Environmental Impacts:**

- Environmental impacts are categorized into soil & water, air, wildlife habitat, and forest retention.
- The Georgia BMP's for forestry are practices that are utilized by timber harvesters to protect soil and water. These practices are monitored by the GFC in a varying schedule. Compliance with BMP's is typically measured at over 90%. The GFC expects that these same results on timber harvest areas in the future within the procurement area of the OPC facilities.
- The GFC agrees with the EIS statements regarding impacts to nutrient cycling on forestlands from biomass harvests. Impacts are limited and can be mitigated through operational activities. In addition, recent research by the University of Georgia indicates that operational timber harvests will not remove all of the logging residues. Anecdotal evidence implies that approximately 50% of the biomass in logging residues will remain onsite due to harvesting limitations.
- BMP's are also required for land preparation activities prior to tree planting. The harvest of a portion of logging residues will reduce the needed land preparation activities and the amount of soil disturbance. In this manner, biomass harvests may increase soil and water quality on some sites compared to the alternative practices that could be used.
- The GFC anticipates that the market for small diameter trees will increase within the procurement areas, thereby increasing the amount of forest thinning performed. This

thinning will reduce forest density and improve wildlife habitat in the area. Of greater significance to the GFC, it is anticipated that these increased forest thinning will decrease wildfire incidence and intensity.

- The GFC anticipates that OPC will utilize logging residues and small diameter (lower value) trees. This will provide new incomes to private landowners from logging residue harvest. It will also likely increase the value of small diameter trees and the amount paid to the landowner for these forest products. These new revenues will provide additional incentives to grow trees and retain forests, instead of converting forestland to developed uses.

### **Economic Impacts:**

- Payments for delivered biomass are expected to exceed \$30 million annually for each facility. The majority of this value will stay within the local community and will increase the ability of landowners to better manage their forests.
- The GFC estimates that 185 jobs will be created or retained within the forest management and timber harvesting sector of the local economy around each mill. This is in addition to jobs at the mills.
- Georgia's forest industry provides \$472 million in state tax revenues to Georgia annually, as determined by Georgia Tech. New industrial facilities, such as those proposed by OPC, will provide additional revenues to the state budget.

### **Direct Impacts to the GFC:**

- The mission of the GFC is to provide leadership, service, and education in the protection and conservation of Georgia's forest resources. The proposed biomass facilities will help achieve the mission by increasing the value of forest resources.
- Providing assistance in developing new forest products and industries to use forest resources is a main function of the agency. This assistance has already been provided to OPC.
- New markets for biomass that will increase forest thinning operations will also reduce hazardous fuels within the forests of the procurement area. This will reduce wildfire incidence and intensity, thereby reducing impacts on the GFC fire protection services.
- New markets for biomass will also increase the need for reforestation. The GFC Flint River Nursery, as well as many private nurseries, have the capacity to provide quality seedlings for these reforestation operations. In addition, this increased market for seedlings will enable continuous improvement in nursery operations..
- The GFC currently provides forest management assistance to landowners within the procurement area of the proposed OPC facilities. This assistance will continue.



"Strength, Stephanie - Durango CO"  
<Stephanie.Strength@wdc.usda.gov>

06/01/2011 09:24 AM

To "Mary\_Hagerty@urscorp.com"  
<Mary\_Hagerty@urscorp.com>

cc

bcc

Subject FW: Comments on the DEIS for the 100 MW Proposed  
Biomass Power Plant, Warren County, Georgia

**From:** Jennifer Pietarila [mailto:JenniferPietarila@semtribe.com]

**Sent:** Monday, May 02, 2011 12:07 PM

**To:** Strength, Stephanie - Durango CO

**Subject:** Comments on the DEIS for the 100 MW Proposed Biomass Power Plant, Warren County, Georgia

Dear Ms. Strength,

The Seminole Tribe of Florida's Tribal Historic Preservation Office (STOF-THPO) has received the USDA, Rural Development, Utilities Program's correspondence concerning the aforementioned project. The STOF-THPO has no objection to your findings in the Phase I cultural resource survey conducted in May 2009 at this time. However, the STOF-THPO would like to be informed if cultural resources that are potentially ancestral or historically relevant to the Seminole Tribe of Florida are inadvertently discovered during the construction process. We thank you for the opportunity to review the information that has been sent to date regarding this project. Please reference *THPO-008085* for any related issues.

I have attached a comment letter for your records.

Thank you,

*Jennifer Pietarila*

Archaeological Data Analyst

Compliance Review

Tribal Historic Preservation Office

Seminole Tribe of Florida

34725 W. Boundary Road

Clewiston, FL 33440

(863)983-6549 ext. 12217



THPO-008085 Response.pdf

SEMINOLE TRIBE OF FLORIDA  
TRIBAL HISTORIC PRESERVATION OFFICE

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TRIBAL HISTORIC  
PRESERVATION OFFICE  
  
SEMINOLE TRIBE OF FLORIDA  
AH-TAH-THI-KI MUSEUM  
  
34725 WEST BOUNDARY ROAD  
CLEWISTON, FL 33440  
  
PHONE: (863) 983-6549  
FAX: (863) 902-1117



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**MICHAEL D. TIGER**

Stephanie Strength, Project Manager  
USDA, Rural Development, Utilities Program  
1400 Independence Avenue, SW, Room 2244  
Mail Stop 1571  
Washington, DC 20250-1571

**THPO#:008085**

May 2, 2011

**Subject:** Comments on the DEIS for the 100 MW Proposed Biomass Power Plant, Warren County, Georgia

Dear Ms. Strength,

The Seminole Tribe of Florida's Tribal Historic Preservation Office (STOF-THPO) has received the USDA, Rural Development, Utilities Program's correspondence concerning the aforementioned project. The STOF-THPO has no objection to your findings in the Phase I cultural resource survey conducted in May 2009 at this time. However, the STOF-THPO would like to be informed if cultural resources that are potentially ancestral or historically relevant to the Seminole Tribe of Florida are inadvertently discovered during the construction process. We thank you for the opportunity to review the information that has been sent to date regarding this project. Please reference **THPO-008085** for any related issues.

We look forward to working with you in the future.

Sincerely,

**Direct routine inquiries to:**

Willard Steele  
Tribal Historic Preservation Officer  
Seminole Tribe of Florida

Anne Mullins  
Compliance Review Supervisor  
annemullins@semtribe.com

JP:am:ws



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
SAVANNAH DISTRICT, CORPS OF ENGINEERS  
100 W. OGLETHORPE AVENUE  
SAVANNAH, GEORGIA 31401-3640

MAY 05 2011

Regulatory Division  
SAS-2009-00523

United States Department of Agriculture – Rural Development  
Attention: Ms. Stephanie A. Strength  
1400 Independence Avenue, SW  
Washington, DC 20250-0700

Dear Ms. Strength:

I refer to your submittal of April 12, 2011, regarding environmental impacts associated with a proposed site for a 100-megawatt proposed biomass power plant – availability of Draft Environmental Impact Statement. The project site is located near the City of Warrenton, in Warren County, Georgia. This project has been assigned number SAS-2009-00523. We previously provided this project number and a letter dated May 11, 2009, for this same project. Please refer to this number in any future correspondence.

Based on a review of the information provided, it appears that this project may likely impact jurisdictional wetlands. To avoid any unforeseen problems, I would recommend that a formal wetland delineation be accomplished prior to performing any work on this site. By establishing US Army Corps of Engineer's jurisdictional limits, possible problem areas within these sites may be addressed and difficulties avoided during the project development phase. Additionally, if you would like to discuss any of the requirements in regards to our program, policy, and procedures, you may contact us directly.

I must point out that if the developer wishes to pursue authorization to impact more than 0.5 acre of waters of the US, including wetlands, the application would be evaluated under our Individual Permit Program. The first step in processing a complete Individual Permit application is to issue a Joint Public Notice which solicits comments from federal, state and local agencies, the general public, and other interested parties so that we can consider and evaluate the impacts of the proposed project.

An important step in our review of an Individual Permit application is to determine the basic purpose of the project. A project's basic purpose acts to guide the scope of review pursuant to the Section 404(b)(1) Guidelines of the Clean Water Act as outlined in Title 40 of the Code of Federal Regulations (40 CFR), published in the Federal Register on December 24, 1980. A stated project purpose cannot be made so specific that it effectively precludes all other potential project sites from consideration. At the same time, the project purpose cannot be so general that

we cannot make a determination that the preferred alternative is the least environmentally damaging practicable alternative. For example, filling wetlands for the purpose of creating high ground for sale of a property is not an acceptable basic project purpose.

The 404(b)(1) guidelines are sequential and require that permit applicants: (1) avoid unnecessary impacts to waters of the US on the preferred alternative to the maximum extent practicable; (2) minimize to the maximum extent practicable the unavoidable adverse impacts to waters of the US on-site; and (3) provide a compensatory mitigation plan to replace the wetland and/or stream functions lost as a result of unavoidable adverse impacts associated with the project. The USACE can only issue a permit for the least environmentally damaging practicable alternative that meets the project's basic purpose. Therefore, the basic project purpose is a critical element in our evaluation for compliance with the 404(b)(1) Guidelines.

Please be advised that for projects impacting 1/10 of an acre or more of wetlands or open water and/or 100 linear feet or more of stream, compensatory mitigation will be required to replace any lost wetland and/or stream function. In addition, if either wetland or stream impact threshold is exceeded, compensatory mitigation would be required for all impacts. The most preferable method of compensatory mitigation is the purchase of mitigation credits from a USACE-approved mitigation bank that services the project area. A complete list of USACE-approved mitigation banks in the State of Georgia can be found on our website at <http://www.sas.usace.army.mil/regulatory/banking.html>. In the event that sufficient mitigation credits are not available, mitigation may be accomplished by restoring, enhancing and/or preserving wetlands and/or streams on or near the project site. Please be advised that submission of an application with an acceptable mitigation plan does not guarantee that a permit will be issued. The application form and information on the Regulatory Program are available on our website at <http://www.sas.usace.army.mil/regulatory/index.html>.

If you have any questions, please call me at (912) 652-5086.

Sincerely,



Shaun Blocker  
Project Manager, Coastal Branch



"Strength, Stephanie - Durango CO"  
<Stephanie.Strength@wdc.usda.gov>

06/01/2011 09:18 AM

To "Mary\_Hagerty@urscorp.com"  
<Mary\_Hagerty@urscorp.com>

cc

bcc

Subject FW: 100 MW Proposed Biomass Power Plant in Warren  
County

History:

 This message has been forwarded.

-----Original Message-----

From: Katrina Morris [mailto:Katrina.Morris@dnr.state.ga.us]  
Sent: Wednesday, May 11, 2011 12:47 PM  
To: Strength, Stephanie - Durango CO  
Subject: 100 MW Proposed Biomass Power Plant in Warren County

Hi Stephanie,

Thank you for the opportunity to review the Draft EIS of the 100 MW Proposed Biomass Power Plant in Warren County. I have no additional comments regarding this project.

If I can be of further assistance, please don't hesitate to contact me.

Sincerely,

Trina Morris

Trina Morris, Wildlife Biologist  
Environmental Review Coordinator  
Georgia Dept. of Natural Resources  
Nongame Conservation Section  
2065 U.S. Hwy. 278 S.E.  
Social Circle, GA 30025-4743  
Ph: 770-918-6411 or 706-557-3032  
Fax: 706-557-3033  
katrina.morris@dnr.state.ga.us  
<http://georgiawildlife.dnr.state.ga.us/>

Give wildlife a chance this tax season! Donate to the Georgia Wildlife Conservation Fund on your state income tax forms - line 10 on short forms (500-EZ) and line 26 on the long (500). Details at [www.georgiawildlife.com/node/338](http://www.georgiawildlife.com/node/338). Forms at <https://etax.dor.ga.gov/>.

Wild about wildlife? Sign up for Georgia Wild, DNR's free e-newsletter about all things nongame, from animals to habitats. Click here to subscribe (or paste this link into your browser):  
<http://www.georgiawildlife.com/news/e-newsletters>

# Georgia Department of Natural Resources

Environmental Protection Division, Watershed Protection Branch  
4220 International Parkway, Suite 101, Atlanta, Georgia 30354  
Linda MacGregor, P.E., Branch Chief  
404/675-6232  
FAX: 404/675-6244

May 27, 2011

Ms. Stephanie Strength, Project Manager  
USDA, Rural Development, Utilities Programs  
1400 Independence Avenue SW  
Room 2244, Mail Stop 1571  
Washington, DC 20250-1571

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Re: Draft Environmental Impact Statement (EIS) for Oglethorpe Power 100 MW Proposed Biomass Power Plant, Warren County

Dear Ms. Strength:

This letter is in response to your April 12, 2011 letter to the Georgia Environmental Protection Division (GAEPD) regarding the public comment period on the draft EIS for the above referenced proposed project.

The GAEPD's Watershed Protection Branch concurs with the proposed project provided that the project complies with all applicable State water permitting requirements, that include, but are not limited to, providing adequate and appropriate water resource capacity for the project (e.g., adequate reservoir storage for withdrawals and adequate water quality capacities for NPDES discharges), meeting the requirements for interbasin transfers, ensuring proper use of reuse water, potential 401 water quality certification requirements, and those requirements under the NPDES General Storm Water Construction Permit. To date, EPD and the various parties involved in this project have had several meetings to discuss State water permitting requirements.

The proposed project would require the issuance or modification of State water permits for the city of Warrenton, Warren County, Thomson-McDuffie County and Oglethorpe Power.

Thank you for the opportunity to offer comments on this draft EIS. If you have any questions, please contact me at 404-308-8062.

Sincerely,



Jeffrey Larson  
Assistant Branch Chief  
Watershed Protection Branch

Cc: Mr. Doug Fulle, Oglethorpe Power Corporation ✓



"Strength, Stephanie - Durango CO"  
<Stephanie.Strength@wdc.usda.gov>

06/01/2011 09:19 AM

To michelle callaway <pinkbirds77@yahoo.com>

cc "Mary\_Hagerty@urscorp.com"  
<Mary\_Hagerty@urscorp.com>

bcc

Subject RE: Boimass Electic Gen. Plant Warrenton, GA

History:

 This message has been replied to and forwarded.

Michelle,

Thank you for your comments. They will be addressed through the Final EIS. If you have any other comments or questions, please send them to me.

Sincerely,

Stephanie A. Strength  
Environmental Protection Specialist  
Engineering and Environmental Staff  
Rural Utilities Service  
1400 Independent Ave, SW  
Mail Stop 1571, Room 2242  
Washington, DC 20250

(970) 403-3559

FAX: (202) 690-0649

<http://www.usda.gov/rus/>

**From:** michelle callaway [mailto:pinkbirds77@yahoo.com]

**Sent:** Saturday, May 07, 2011 7:24 PM

**To:** Strength, Stephanie - Durango CO

**Subject:** Boimass Electic Gen. Plant Warrenton, GA

What effect will the Biomass plant 's usage of water have on the wells of the residents that live closest to the plant? We all have well water, not city.

What kind of smell will come from the plant? There is a paper mill in a near by town that smells just like rotten eggs.

So far, these are the only two questions I have.

Michelle Callaway

( i took the hard copy home to read and will live the closest to the plant)