



November 17, 2009

Mathy Stanislaus
Assistant Administrator
Office of Solid Waste and Emergency Response
Environmental Protection Agency

Mr. Stanislaus:

I write to you today to commend your efforts to prioritize renewable energy development on brownfields and contaminated sites. We are strongly supportive of the “RE-Powering America’s Lands Initiative,” designed to determine where and how renewable energy could be built on brownfields, and believe that the agency can take further steps to promote and incentivize this idea both within the Environmental Protection Agency (EPA) and in national policies currently under discussion.

The Wilderness Society works on behalf of its more than 400,000 members and supporters to protect wilderness and inspire Americans to care for our wild places. We believe that the nation must make the transition to a clean energy economy as quickly as possible, but that large-scale renewable energy facilities must be appropriately sited so as not to disturb sensitive wildlands or wildlife habitats, or jeopardize ecological or cultural diversity. Renewable energy generation and transmission facilities are not appropriate everywhere and, as with any energy development, must be guided to suitable places across the landscape.

One of the most promising ways to reconcile lands protection and renewable energy development is to site the industrial renewable energy facilities and associated transmission on brownfields or other disturbed sites. Siting renewable energy on contaminated lands reduces the pressure to develop pristine “greenspaces.” At the same time, it improves community health, engages local residents in the clean energy transition, and helps communities to achieve their full economic potential.

We are heartened to see your office’s efforts to research and catalogue the brownfield sites with the best renewable energy potential, and believe additional steps could be taken to prioritize development on those sites. Revitalizing brownfields and other contaminated sites with renewable energy is a unique opportunity for private-public partnerships, as solar, wind, and geothermal developers would assist in the cleanups with their private capital and business approaches. In order to leverage this opportunity, renewable energy development must be considered an economic benefit when it comes to brownfields ranking criteria.

For example, the EPA’s “FY2010 Guidelines for Brownfields Cleanup Grants” lists ranking criteria for cleanup grants¹ We were pleased to see the brief inclusion of renewable energy as a type of “sustainable redevelopment” in FY2010’s guidelines as compared to FY2009’s guidelines, but we believe that renewable energy development must specifically be enumerated as an economic benefit and a more fleshed-out ranking criterion (see attachment for suggested changes).

¹ <http://www.epa.gov/oswer/docs/grants/epa-oswer-oblr-08-08.pdf>

There are also ways to prioritize renewable energy development on brownfields in federal legislation, such as language in the Senate Energy and Natural Resources Committee's American Clean Energy Leadership Act of 2009 that directs EPA and other agencies to provide technical assistance to stakeholders and to encourage renewable energy production on brownfield sites. We are working with other interest groups to add additional language promoting renewable energy on brownfields sites to federal legislation, but in the meantime OSWER must also work to strongly promote the idea within the agency and in other national processes.

Renewable energy development on brownfields is a win-win situation for local communities, brownfields advocates, environmentalists, project developers, and the EPA itself. The EPA and OSWER have taken great strides toward calling the nation's attention to these opportunities. We believe additional steps should be taken to ensure that renewable energy development on brownfields is actively prioritized. We stand ready to assist you in your efforts.

I welcome the opportunity to discuss our work on this matter with you at your earliest convenience. Please contact me at 202-429-2681 to arrange a time.

Thank you for your time.

Sincerely,

David Moulton
Director, Climate Policy and Conservation Funding
The Wilderness Society

CC:
Lura Matthews, Center for Program Analysis, Office of Solid Waste and Emergency Response
Patricia Overmeyer, Land Revitalization Coordinator, Office of Brownfields and Land Revitalization
David Lloyd, Director, Office of Brownfields and Land Revitalization, Office of Solid Waste and
Emergency Response
Laura Gabanski, Healthy Watersheds Initiative Leader, Office of Water

ATTACHMENT

Potential language to prioritize renewable energy development on brownfields in the “FY10 Guidelines for Brownfields Cleanup Grants”

This type of language might be inserted under Section V.B. 4, “Project Benefits,” as seen in red in the language below:

4. Project Benefits

Under this criterion, proposals will be evaluated on the extent to which the project’s anticipated outcomes promote general welfare through the improvement of the public health and safety, economy, **energy**, and environment of the targeted community and how these outcomes will contribute to your overall community “vision” for the revitalization of brownfield sites. Consideration will be given to how public health issues are addressed during the project, the anticipated benefits of redevelopment, and the incorporation of sustainable practices. [Refer to section I.D. for an explanation of outcomes.] [30 Points]

a. Welfare and/or Public Health [10 Points] Describe the environmental, social, and/or public health benefits anticipated from the redevelopment of the site cleaned up under this grant. Describe how nearby and sensitive populations in your targeted community will be protected from contaminants during cleanup work conducted on the brownfield site under this grant.

b. Economic Benefits, **Renewable Energy**, and/or Greenspace [5 Points] Explain how the grant will produce:

(i) Economic benefits, such as increased employment and expanded tax base, through the redevelopment of the site cleaned up under this grant. Provide quantitative estimates where feasible; **and/or**

(ii) **Renewable energy, such as wind, solar, or geothermal energy generation, through the redevelopment of the site cleaned up under this grant. Provide approximations of megawatts, describe the energy transmission process including whether or not the energy generated will be used in the community, and explain additional benefits of renewable energy to the question; and/or**

(iii) **Other non-economic benefits associated with the site to be reused for greenspace or other not-for-profit activities. Greenspace includes areas redeveloped for uses such as parks, recreation areas, greenways, or environmental buffers. Other not-for-profit activities include the work of governmental or charitable organizations.**

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse [10 Points]

Describe any anticipated environmental benefits, beyond the remediation of contaminants, associated with the **sustainable redevelopment** of the site cleaned up under this grant, including the use of existing infrastructure, such as utilities and public transit, green buildings, energy efficiency, water management, green remediation, construction and demolition materials recycling, diesel emissions reductions, and renewable energy on brownfields. [Refer to Brownfields FAQ at http://www.epa.gov/brownfields/proposal_guides/FY10_FAQs_v1.pdf for a description of these and other EPA initiatives.]