



29 Oct 08

Mr. Mike Gleason  
Chair, AZ Corporation Commission  
Commissioner's Wing  
1200 W. Washington  
Phoenix AZ 85007-2996

Subject: Drake Cement Plant – biomass utilization

Dear Chairman Gleason:

The Greater Flagstaff Forests Partnership (GFFP) is an alliance environmental, governmental, and business organizations dedicated to researching and demonstrating approaches to forest ecosystem restoration in the ponderosa pine forests surrounding Flagstaff, Arizona. We were actively involved in working with the ACC to incorporate woody biomass into revision of the old EPS into the recently approved REST rule, along with numerous communities and counties throughout the State – including both Flagstaff and Coconino County.

APS and Drake Cement recently proposed to use woody biomass fuel, as a partial replacement for coal, to satisfy the thermal needs at their new facility. We are very disappointed in the Commission's recent decision to reject this application for a thermal renewable energy project for the Drake Cement Plant.

Forests throughout the State are in trouble. What some regard as green and thriving are, in-fact, overcrowded, out-of-balance, and at serious risk of loss from insect, disease, wildfire, or other events. The declining health of our forests is a significant threat to many communities in our state, including those in the greater Flagstaff area. This threat extends to life, property and infrastructure, and includes impacts to wildlife habitat, watershed values, visual quality, and spiritual and emotional bonds. All of these values affect the well-being and economic vitality of our communities.

Productive use of biomass from our forests is a key component to reversing a downward trend in forest vitality and positioning the State as a leader in emerging technology. Rejection of this request appears to be a short-sighted decision that presents a serious set-back to the much needed efforts to protect our communities, restore our forests, and develop sustainable wood-based industries, as well as a major disappointment for the many people engaged in this effort.

It is our hope that the Commission comes to understand that excessive biomass is a *threat* to the State and will view it as an emerging *opportunity* to address renewable energy needs. A variety of biomass energy projects must be approved, along with solar, wind and geothermal.

Respectfully,

Paul Summerfelt  
President – Board of Directors

CC: Members – Greater Flagstaff Forests Partnership  
Flagstaff City Council  
Coconino County Board of Supervisors