24A-3076

Under Review Case Age: 12

Administrative / General Public Comment : eFiled

10/4/24

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Public Comments

Public Comment(s)

Filed	Commenter	Comment	Filed/Ack	View Document
General Public Comment				
10/04/2024	Gish, Chris [PUBCOM]	See attached comments. The developer is proposing to use an inadequately tested technology, and is relying on unsubstantiated claims about biochar and emissions to promote this project.	Filed	

It is totally inappropriate for this biomass burning proposal to go through the 248(j) expedited process. The public and the PUC need more time to adequately evaluate the long term *public good* of this proposal, which would attempt a combustion technology never before used in the U.S. for energy production. There are many serious unanswered issues regarding this proposal, some of which I highlight below:

Biochar has not been proven to be a reliable, long-term, and safe additive to soils. As a long-time Vermont farmworker, I have serious concerns that this facility would exchange proven ways to use organic materials to mitigate climate change and sequester carbon — preserving crop residues and minimizing harvests from forests — for an untested and potentially toxic "biochar" product. Without robust long term evidence (which currently does not exist), the PUC should not consider the carbon exported from the facility in the form of biochar to be safely sequestered and thus not a climate impact caused by the plant. There have been very few trials of the long-term fate of biochar applied to soils, and what studies do exist show very inconsistent results — there is not solid evidence that biochar actually safely stores carbon in the soil in the long term. Biochar may also cause other climate impacts, as described in a 2023 review of the state of biochar research: "Many studies have also reported that increased emissions of CH4, N2O and volatile organic compounds from biochar application could offset carbon-sequestration benefits" Biochar can also cause other negative impacts like enrichment of organic contaminants and heavy metals, reduction in the efficacy of herbicides and pesticides in agricultural soils, a decrease in macronutrient uptake by crops (e.g. nitrogen and phosphorus), and an increase in the susceptibility of crops to common plant pathogens. Biochar application to fields may also lead to pm 10 particulate pollution, because the low bulk density particles are easily suspended in the air at application or with any form of tillage.

Finally, the public and the PUC must be wary of deceptive claims made by the developers of this proposal. Spokesperson Evan Dell'Olio has claimed that the facility would produce "no emissions," which the public and the PUC should be able to recognize as an outrageous lie. VRG's own air permit shows alarming levels of 1,3-butadiene, acetaldehyde and formaldehyde, all of which are serious health pollutants in excess of their respective state Action Levels. The facility would also, of course, emit carbon dioxide, which, in exhibits submitted to the PUC, VRG simply ignores to make the spurious claim that the plant would "annually prevent 6,512 tons of carbon dioxide" from going into the air. VRG has also claimed that at least 51% of the biomass burned would be from "farming" sources, but it is important to evaluate this claim carefully — VRG absurdly considers any production timberland to be "farming," because it is engaged in producing "fiber" under Vermont's Required Agricultural Practices. Specifically, VRG's consultant notes they expect "that the overwhelming majority of this will come from timber harvesting operations (fiber) and management of maple sugarbushes." Whatever the wording VRG may apply, this wood will still accelerate climate change when it is exported and its biogas burned instead of being allowed to continue growing or naturally return its nutrients to the forest floor.