

December 30, 2024

Don Rivenes, Morgan Ranch, speaking on behalf of Community Environmental Advocates.

The Carbonizer proposal sounds like a needed project but we have a few questions.

We were told by an OAS county representative that a CEQA review, air quality, and environmental analysis regarding project impacts is being completed through the Use Permit process with the City of Grass Valley. It appears that this is not happening. Nowhere is it explained what class 1,4,7, and 8 Categorical Exemptions are.

Potential environmental impacts:

Air quality and traffic – Impact to residents from transporting the waste material and biochar throughout the county by diesel trucks, diesel use to heat the material, by-products from the heating process (nitrous oxide, PM)

Carbon emissions – The process itself is less harmful than open pile burning, but our understanding is that it captures 30% of the carbon and 90% of the waste. What happens to the rest of the carbon and waste? What will be the total emissions created and lost to the air, along with other toxics.

Noise - This project creates noise (though efficiency of the carbonizer makes any disturbance minimal, according to the City Planner). Where is the study of this? Is an animal shelter a good idea next to this noise-producing project (impact on the animals and people working there)?

Here are additional questions.

- Is the site on county land only, private land or both?
- What will be the size of the trees collected? Will overzealous tree clearing occur around the county? PG&E?
- Will landowners pay to have the waste removed or be paid?
- Also there is no mention of how or where the biochar will be utilized. Will it be sold within the county and to whom, or will it be given free to whomever wants it?

Most of these questions can be answered with a regular environmental analysis.

Thank you for your time.