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TO: June Tierney, Commissioner Department of Public Service
FROM: Anson Tebbetts, Secretary Agency of Agriculture, Food and Markets
REASON: Consultation on Bennington County Regional Energy Plan
DATE: July 12, 2017
RE: New Haven Town Energy Plan

In response to your June 20, 2017 email request the following comments are provided as consultation from the Agency of Agriculture Food and Markets.

Pursuant to 254 V.S.A. §4352 (i), the Agency of Agriculture, Food and Markets has reviewed the New Haven Town Energy Plan. From the Agency's perspective, the plan needs further mapping and information on where renewable energy development would be allowed. The Agency would offer comments to the New Haven for inclusion if the plan is updated and reviewed at a future date and time.

The Agency of Agriculture, Food and Markets works in conjunction with USDA Animal and Plant Health Inspection Service (APHIS) to protect Vermont from invasive insects that can impact Vermont forests and trees. The plan to use woody biomass from the towns in Bennington County is positive but the Agency cautions that over the borders in New York State and Massachusetts that are invasive species that are impacting forests and trees. Currently, there are two Federal (USDA APHIS) quarantine regulations that are relevant to movement of wood (logs, cordwood, chips) from Massachusetts and New York (emerald ash borer (EAB) and Asian longhorned beetle (ALB)). In addition, there are Vermont State quarantines that may be relevant, including the Vermont external firewood rule and the Vermont hemlock woolly adelgid (HWA) quarantine.

Generally, biomass and cogeneration facilities should employ technologies and procedures designed to limit the possibility invasive pests are moved and allowed to escape into unimpacted areas because of their daily operations. Examples include screening of storage and processing areas, limitations on the length of time unprocessed material can remain on-site before use, chipping logs at the harvest site rather than at the facility, careful selection of harvest areas and species used, timing of harvests to target periods when pests are less likely to be mobile, heat treatment, and other safeguarding practices. Any of these or other procedures should be employed as appropriate to help limit the introduction and spread of regulated (and unregulated but nonetheless potentially devastating) plant pests.

The Agency of Agriculture, Food and Market's requests that these concerns be addressed in future rewrites of the plan but to be of great concern when aspects of the plan associated with woody biomass are implemented.

The Agency appreciates the plan's emphasis on the maintaining its agricultural soils, both Natural Resource Conservation Service mapped and soils in recent use, for the purposes of agriculture [page 24] and identified by New Haven as one of several "environmentally sensitive areas" and included as what

the Agency would understand to be a locally identified resource. Agriculture appears to be the predominant land use in Figure 8. This figure does not appear to be merged with the Known and Possible Environmental Constraints maps [Figures 23 and 24] leading to an unclear picture of potential locations for renewable energy development besides emphasis of onsite development for onsite usage [page 58].

Maintenance of the agricultural landscape and support of diversification and value-added agricultural products can support a local food system and reduce transportation costs of food. Understanding how the town will promote a local food system, beyond the maintenance of agricultural soils for the purpose of farming, and use of smaller parcels for direct marketing opportunities could include identifying targets for local food production and sales

Thank you for accepting our comments and if you would like any further information, please feel free to contact me.