

## BioDevCo Public Comment

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To: HearingComments, DNREC (MailBox Resources) <DNRECHearingComments@delaware.gov>

Recently I attended a Food and Water Watch presentation about the proposed biogas plant in Sussex County. I came to the following conclusions:

This is not about ameliorating pollution from the poultry plants. It is about producing biomethane that the company can sell to other entities to burn and create more greenhouse gas.

If anyone wants to learn about ways to make the poultry industry sustainable and less polluting, all they have to do is google: Can the poultry industry operate sustainably without polluting? It can be done, but only if the involved entities have the will (or are otherwise incentivized) to do it.

The project under consideration is NOT doing this sustainably, no matter what the company, BioDevCo, may say. They are only concerned with how to make more money by installing what amounts to a refinery in an agricultural/residential zone so they can sell biomethane to local and regional natural gas producers to burn, which will add more pollution to the regional atmosphere.

In addition, the company has not produced all the documentation that would prove the project would not have a significant effect on the environment. That's because they CAN'T say it will not have a significant effect and risk being sued later for lying on the documentation.

In addition, there are marketing permits that have not even been considered.

Also, DNREC is not doing the job entrusted to them by even considering granting a permit for this project. They are not willing to consider or even recognize the advocacy community which is sounding the alarm that this project will inject negative health impacts on an already-impacted sacrifice zone. On their website, DNREC lists Strategic Priorities:

### **“Improving Delaware’s Preparedness**

Includes investing in critical infrastructure such as dams, impoundments, dikes and other water control structures, wetland conservation to reduce flooding (and improve water quality and enhance wildlife and fisheries habitat), shoreline nourishment and beach protection, mitigation and adaptation planning for sea level rise and other effects of climate change, reducing the production of greenhouse gases, improving stormwater management, maintaining emergency response preparedness, and developing environmental indicators to track progress.”

NOTE: All of the above is betrayed by the BioDevCo project.

### **“Creating Cleaner, Lower Priced and More Reliable Energy**

Includes implementing energy efficiency recommendations, investing in clean and renewable energy infrastructure, modernizing power plants, working to reduce cross-state air pollution, and promoting cleaner transportation solutions.”

NOTE: The BioDevCo project does not produce cleaner, sustainable, renewable energy. The produced biomethane will only add to pollution levels in the region.

### **“Ensuring Clean Water**

Includes investing in clean water infrastructure, watershed-based and cooperative restoration projects for the Delaware and Chesapeake Bays, the Nanticoke River, the Inland Bays, the Ocean shore, and other areas, supporting conservation cost-share projects for Delaware farmers, groundwater protection, removing toxics from Delaware waters, and supporting beneficial re-use of treated wastewater.”

NOTE: The Nanticoke River stands to receive additional pollution from this project when the wastewater surpasses what can be treated in local municipal facilities, which is a virtual certainty based on the company’s intended operational level.

An advance copy of the revised Social Principles of the United Methodist Church states the following:

“We oppose policies and practices that relegate marginalized communities to a permanent underclass status and ignore indigenous and other sources of communal wisdom, which call for air, land, and water to be treated with profound respect. Additionally, these groups suffer disproportionately from higher rates of asthma, cancer, birth defects and other preventable medical conditions. These health problems are associated with pollutants and other chemicals in soil, water and air that affect our drinking water, foods and physical environment. We urge governments, businesses, and civic institutions to give priority to increasing access to prevention and treatment services. We call for the institution of environmentally just principles, policies and practices. We affirm the wisdom and agency of indigenous peoples and marginalized populations to determine for themselves practices and policies that best provide for their basic human needs, including food, water, shelter, and land free from toxic wastes. Self-determination entails, among other things, access to all pertinent information and significant decision-making power over industrial, agricultural, and other developments that have potential to wreak significant harm on land, air and water.”

There are 17 United Methodist Churches in the area that would be affected by this project. Each one must attend to the UM Social Principles, which is in direct opposition to this project. United Methodists are concerned with community justice and against the creation of sacrifice zones. As such, as an entity, the Methodist Action Program must oppose this project in the strongest possible terms.

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