

Biomass – Summary of comments from Councilors

Draft – May 21, 2023

Overview

The Vermont Climate Council met on April 24 to review recommendations from the Biomass Task Group. After several hours of discussion and public comment, the Council voted nearly unanimously not to adopt the recommendations as written.

The Council agreed to have the Climate Action Office collect comments and concerns from Council members regarding the recommendations. The Climate Action Office, with help from the Consensus Building Institute, agreed to synthesize the input and present a summary to the Steering Committee, which will decide on next steps. The Steering Committee will not be tasked with developing a new draft, but rather a process for the Council to develop revised biomass actions that address councilors' concerns.

Comments from Councilors during the April 24 meeting

Key themes from the Councilors' discussion during the April 24 meeting included:

- Support for the analysis and studies recommended by the Task Group, and appreciation for the work of the group.
- Concerns about adopting all the recommendations as written, in particular due to:
 - Questions about the impact on Vermont's electricity supply from the potential closure of the state's two biomass facilities. These questions included concerns about impacts on the reliability and diversity of energy sources, the state's reliance on imported energy sources, the carbon profile of whatever energy would replace the plant's output, the social justice implications of importing energy that may have negative impacts on communities outside of Vermont, as well as questions about the impact on rural communities and rural economies in Vermont.
 - A desire to understand better the results of the health studies that have been done to gauge potential negative impacts from the state's biomass plants.
 - A concern about the Council making policy recommendations on specific power plants or initiatives.
- Support for using the life-cycle analysis to better understand the carbon emissions from biomass energy.

Comments from Councilors after the meeting

After the meeting, 8 councilors offered additional comments¹. While their full comments are included as an annex, below is a summary of key themes and suggested revisions. In addition, a

¹ Councilors Paula Melton, Kelly Klein, Johanna Miller, Jared Duval, Bram Kleppner, Julie Moore, TJ Poor (for Commissioner June Tierney) and Michele Boomhower (for Secretary Joe Flynn) submitted comments.

member of the Science and Data Sub-Committee and Biomass Task Group submitted comments and urged Councilors to review the expert presentations offered to the Biomass Task Group. His comments are included separately in an annex.

Key themes and suggested revisions from Councilors included:

Overarching comments

- (Some) recommendations appear to be out of Council purview and too specific, leading to an inappropriate precedent.
 - Concern about the Council weighing in on specific plants and projects (such as the planned district heat project at McNeil), and concern about doing a “full equity review” around the potential siting of that thermal district heat infrastructure.
 - Concern about the depth of engagement in Burlington’s Old North End called for in #6, without the context of other engagement needed.
 - Concern about naming the two plants by name throughout the document.
- Request to structure the recommendations so that the council can vote on each one separately.
- Request to divide the recommendations into those that would be added to the Initial Climate Action Plan as an addendum, and those that are recommendations for the Council in its work.
- Before reaching conclusions about the phase out of existing biomass facilities, the Council first needs information from the lifecycle analysis. The text throughout should reflect that a phase-out is not pre-determined.

Comments by recommendation

- Commenters expressed support for keeping the first recommendation (no new biomass facilities). However, one commenter suggested making this question part of the study, and adding a line in the recommendation that says, “unless evidence-based studies show that benefits substantially outweigh negative impacts of the facility.”
- Several councilors suggested deleting or significantly rewriting Recommendation 2.
 - Several commenters suggested re-writing the recommendation to focus on measures to significantly increase efficiency at biomass facilities.
 - One commenter asked to rewrite Recommendation #2 to make clear that current biomass generating facilities should not be physically expanded to increase capacity, but that the Council supports replacing existing equipment within those facilities with more efficient and/or less polluting equipment (and if this has the side-effect of increasing capacity, that’s fine.)
- Several commenters expressed the need to look closely at the alternative source(s) of electricity should the biomass plants be phased out or closed.
 - In considering the question of whether existing biomass facilities should be phased down or potentially phased out, the lifecycle GHG emissions analysis

- should compare existing biomass facility emissions to that of fossil fuel generation or other options that would be required to replace biomass facilities.
 - Should only phase down if they won't be replaced by fossil fuel generation.
- In the study, include the impacts on Vermont electricity rate payers.
- When evaluating the role of district heat, look for the lowest-emissions path to zero emissions heat. We should be guided by the calculations.
- Detailed comments from one Councilor on community engagement and health impacts:
 - I'd like to see Recommendation #6 rewritten to recommend an investigation into the a) the levels of pollution around Vermont's biomass plants at lung level, and, if possible, an effort to identify which and how much of those pollutants are from the biomass plant and which and how much of those pollutants are from other sources.
 - Bonus points if we can identify pollution from transportation vs. pollution from indoor and outdoor fires (fireplaces/woodstoves/fire pits) vs. pollution from gas-fired appliances (furnaces, water heaters, stoves, space heaters) vs. heating oil appliances.
- Another councilor suggested making Recommendation 6 a bullet under Recommendation 3, and paring the text down significantly, to focus on "any ongoing needs of residents, including after phaseout if that course is taken, who may have been or may continue to be exposed to ambient emissions from existing biomass plants in their neighborhoods."
- Also, a suggestion was made to reduce the text in Recommendation 7 to: "Public health impacts should be an indispensable component of informing any future actions taken regarding electricity generation in Vermont."
- Detailed comments from one Councilor on Recommendation #3, the study:
 - Amend the introduction to recommendation 3 as follows: The Vermont Climate Council recommends that the State ~~plan and prepare for~~ **consider a complete the phaseout** of wood biomass electricity generation ~~at the McNeil and Ryegate facilities~~ and **instead the phase up of** other energy sources, complemented with other important actions such as efficiency and ~~consumption~~ **demand** reduction. To inform ~~the~~ **its phaseout considerations**, the State must advance an evidence-based study immediately to be completed expeditiously by an independent expert that would be managed within the Climate Action Office in coordination with the Public Service Department. The study ~~(ies)~~ should include:
 - Amend bullet 1 of recommendation 3 as follows: investigation of ~~when~~ **whether** and how to phase out Vermont's two existing biomass electricity facilities as compared to available alternatives over different timescales;
 - Amend bullet 5 of recommendation 3 as follows: the health, air quality, climate, cultural resources, and financial costs and benefits that could accrue to different sectors and constituents (e.g., **nearby residents**, ~~local~~ **Indigenous** communities, landowners, ratepayers, etc.);

- Delete bullet 9 of recommendation 3.
- Detailed comments from another Councilor on Recommendation #3:
 - I'd like to see Recommendation #3 rewritten to request that the state develop a plan for replacing the electricity generated with biomass with electricity generated by methods that produce less CO2 and other pollutants per kWh.
 - a. This comparison should be a lifetime comparison, starting now, which is to say, the carbon created to build the current biomass infrastructure has already been expended, so the comparison of CO2 output should be burning biomass in our existing facilities vs. installing, for instance solar panels, including the carbon emissions associated with creating the panels, transporting/installing them, and operating them. If the time period across which we look is out beyond the expected lifetime of the panels, the carbon associated with their disposal should also be included.
 - b. I support the recommendation that the study include "what kind of clean energy replacements that (sic) would be needed to maintain Vermont's electrical reliability."
 - c. To address reliability, the plan should include a way to address the intermittency of solar and wind, whether that be through storage, or importing electricity generated with hydro or nuclear power, or other.
 - d. I support the recommendation that these changes be paired with efficiency and consumption reduction.
 - e. Regarding the recommendation around the logging economy, I'd like to see this rewritten into two sections:
 1. A plan to allow landowners to keep their land forested without the income from biomass. In my view, this should be part of a larger plan to stop the reduction and fragmentation of Vermont's forests, both public and private.
 2. A plan to transition the people working in extracting biomass from the forest, processing it, transporting it, and burning it into clean energy jobs or into other jobs. In my view, this should be part of a larger plan to support the transition of everyone whose job will be eliminated or changed by the transition to clean energy.
 - f. I support the rest of the recommendations related to Recommendation #3
 - 1) how a phase out or lack thereof could impact Vermont's 2025, 2030, and 2050 GWSA greenhouse gas emission reduction requirements;
 - 2) the health, air quality, climate, cultural resources, and financial costs and benefits that could accrue to different sectors and constituents (e.g., local communities, landowners, ratepayers, etc.);
 - 3) traditional ecological knowledge;
 - 4) Adverse impacts to public health from particulate matter and impacts to quality of life and cultural resources should be assessed and quantified;