

**Biomass Task Group
Recommendations
6 October 2022
Comments added 10-13-22**

**DRAFT
FOR DISCUSSION PURPOSES ONLY
Not a Product of the WG at this Time**

1. New electric generation biomass facilities in the State of Vermont should not be utilized (i.e., proposed, permitted, and built) as they will not decarbonize the State's electricity generation.
2. The two existing biomass electricity facilities should not be expanded to generate more electricity than current production allows. The only potential exception to this is with respect to the development of a thermal application at McNeil, which is referenced below in 4(a).
3. The Vermont Climate Council should commission an evidence-based study by an independent third-party expert that would be managed within the Climate Action Office. The study should include traditional ecological knowledge and should investigate if, when, and how to phase out Vermont's two existing biomass electricity facilities; how a phase out or lack thereof could impact Vermont's 2025, 2030, and 2050 GWSA greenhouse gas emission reduction requirements; the health, climate, and financial costs and benefits that could accrue to different sectors and constituents (e.g., local communities, s, land owners, etc.), and the alternative revenue streams and opportunities for the rural working economy, land owners, and others to pursue a just transition. The study should clearly look at the timeline of a phase out and the attendant ramp-up of clean energy replacements that would be needed.
4. The Task Group recommends that two matters require further exploration:
 - Any expansion to the McNeil facility to accommodate additional wood combustion for co-generation of heat must be specifically investigated. The investigation must examine possible impacts on the health of residents of the adjacent communities. It must also determine whether such an expansion would extend the operating life of a facility and therefore, cause health burdens to be borne longer-term. Additionally, it must look at the expansion considering Vermont's 2025, 2030, and 2050 GWSA emission reduction requirements. An expansion of electricity production for the viability of the thermal application must be considered by conducting a life-cycle analysis which would clearly

demonstrate that the GHG emissions caused from the expansion of the biomass burned are significantly less than the GHG emissions avoided from the thermal application displaced, and on an adequate timescale.

- Biomass for Heat at a Residential and Commercial Scale and the impact on Vermont's forests bears further exploration as a climate solution. The Vermont Climate Council should consider forming a new task group to consider this topic explicitly, the right composition needed to do so, and the right process to ensure a clear directive and the capacity to support the task group. If a new task group is formed, members from this task group should be invited to participate so that the learning done through this process is carried forward into the new work. Additionally, consideration should be given to including representation from outside state government and the Climate Council process to have diverse opinions represented.
5. GHG emissions from wood biomass electricity generation should be assessed at the point of combustion and GHG sequestration should be assessed in the Carbon Budget, so that those different numbers can be compared accurately over time. The Task Group also recommends that a lifecycle GHG assessment provide sensitivity analysis around wood biomass GHG emissions relevant to the 2025, 2030, and 2050 timelines required by the GWSA.
 6. Engagement must occur with the residents of Burlington's Old North End, Winooski, and other neighborhoods whose residents have been exposed to smokestack emissions and other adverse exposures related to the plant for some time. Adverse impacts to public health, cultural resources, and quality of life should be assessed and quantified. The Just Transition Subcommittee, in partnership with the Biomass Task Group, should lead such efforts in a respectful, consistent, and ongoing manner and consider the range of issues and needs for these communities that may extend beyond biomass.
 7. More public health monitoring must occur in and around the neighborhoods adjacent to McNeil and cited in the areas most sensitive to pollution. The Inflation Reduction Act makes funds available for such monitoring and should be utilized. Public health impacts should be an indispensable component of any future actions taken regarding biomass electricity generation in Vermont.