

**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-led generation biomass facilities in the State of Vermont should not be used.
2. The Ryegate and McNeil facilities should not be expanded to increase the currently permitted hourly output capacity physically or otherwise. **Furthermore, the facilities should strive to use less biomass than they are currently permitted.** .
3. **The** Vermont Climate Council recommends that the State plan and prepare for the phase out of wood biomass electricity generation at the McNeil and Ryegate facilities and the phase up of renewable energy sources, complemented with other important actions such as efficiency and consumption reduction. To inform the phase out, 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:
 - traditional ecological knowledge;
 - investigation of **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, 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.);
 - an investigation of the impacts to Vermont's Forest Economy that plant closures could cause, acknowledging the sensitivity around market conditions for the material inputs currently employed at the plants, and the importance of those markets in ensuring that the management **of Vermont's forests for the public good,** and support for the associated working lands enterprises and rural communities that depend on them, remains viable. ***Alternate markets, aligned with climate objectives, must be secured before plant closures are considered***
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 - Implications for phase out in relation to the long proposed McNeil plant expansion for co-generation of thermal heat for district heating.

- The study should clearly look at the timeline of a phase out and the attendant ramp-up of what kind of clean energy replacements that would be needed to maintain Vermont's electricity reliability.
 - The study should consider phase out "when" scenarios to better understand implications for a 5-, 10- or 20-year phase out.
4. The Vermont Climate Council should further explore the role of Heat at a Residential and Commercial Scale as a climate solution and the impact on Vermont's forests.
- The Vermont Climate Council should form 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 and the expertise needed.
 - This group will need to include as part of that scope reviewing the long-proposed expansion of the McNeil facility to accommodate to accommodate wood combustion for thermal heat production -whether as co-generation from electricity production or as a thermal-only replacement for a phased-out electricity generating plant. In addition to climate and forest implications, the investigation must examine at the least the impacts on air quality and the health of residents of the adjacent communities. McNeil is on land that is listed on the state historical site for the most highly sensitive archaeology in the state so cultural resources must be addressed as well.
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. *NOTE: At least Maine is already moving in this accounting direction.*
6. Engagement must occur with the residents of Burlington's Old North End, Winooski, and other neighborhoods exposed to ambient emissions and other adverse exposures related to the plant for some time. The Just Transition Subcommittee, in partnership with the relevant Subcommittees and Task Groups of the VCC, 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. Adverse impacts to public health, quality of life, and cultural resources should be assessed and quantified pursuant to the study discussed in recommendation number three and in conjunction with the appropriate Agencies such as the the Department of Public Health and the State Historic Preservation Office.

7. More public health monitoring must occur in and around the neighborhoods adjacent to McNeil and Ryegate and sited in the areas most sensitive to pollution. Relevant state Agencies, such as the Department of Environmental Conservation Air Quality and Climate Division and the Department of Public Health, should be engaged in the design and implementation of any targeted air monitoring. The Inflation Reduction Act makes funds available for such monitoring and should be utilized. Public health impacts should be an indispensable component of informing any future actions taken regarding biomass electricity generation in Vermont.

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