



**To: Biomass Energy Development Working Group**  
**From: Center for Biological Diversity, Partnership for Policy Integrity and Vermont Sierra Club**  
**Date: December 6, 2011**  
**Re: Comments on Report on the Future of Vermont Biomass**

In response to today's hearing and your call for public comment, we would like to respond, in brief, to the Biomass Energy Development Working Group's report on the future of biomass energy in Vermont. We are concerned that your plan, which calls for significantly increased biomass energy production, would threaten Vermont's forests, the health of Vermont citizens, and the greenhouse gas reduction goals set by the Vermont state legislature.

*1) The Threat to Vermont Forests*

The current proposal for expanded biomass power will significantly increase forest cutting in Vermont, beyond any level that might be considered sustainable. Current data, including studies from the Cary Institute of Ecosystem Studies and the Biomass Energy Resource Center indicate that Vermont's forestlands available for logging are already being cut at close to maximum potential – and yet bioenergy facilities proposed in the state would require nearly 1.5 million tons of additional wood a year, with the Beaver Wood Energy facility proposed for Fair Haven itself requiring in excess of 500,000 tons of wood a year. In addition, biomass harvesting is by definition a more intensive form of harvesting which can have detrimental effects on a range of ecosystem values. There is no protective harvesting standard in place, and no analysis or understanding of how this harvesting, increased in both volume and intensity, would affect the long-term health and diversity of Vermont's forests.

*2) The Threat to the Health of Vermont Citizens*

Burning wood is a potent source of particulate matter, as well as other pollutants that contribute to ground-level ozone. The pollution profile of wood is similar to and in some cases even greater than that of fossil fuels. Vermont already has asthma rates above the national average, with the Centers for Disease Control rating Rutland and Burlington as having some of the highest asthma rates in the country. The health impacts from wood burning are so great that the American Lung Association recently adopted a position

opposing the use of biomass for energy. Increasing the number of biomass facilities in Vermont would negatively impact air quality and the health of state residents.

### *3) The Threat to Vermont's Greenhouse Gas Reduction Goals*

While the Biomass Energy Development Group report is equivocal on the issue of carbon emissions from biomass, and at one point implies that they are “carbon neutral,” current understanding is that harvesting trees for energy emits more carbon than fossil fuels – even when wood is harvested at “sustainable” levels. The State of Massachusetts is putting in place regulations that will restrict biomass eligibility for renewable energy credits, having recognized that net emissions from biomass energy are excessive in light of near-term greenhouse gas reduction goals.

The Vermont legislature has adopted an initial goal of reducing greenhouse emissions by 25% below 1990 levels in 2012, with even larger cuts to follow. These goals will be fundamentally undermined by new biomass facilities that will actually increase carbon emissions.

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In conclusion, we believe that rather than promoting the exploitation of forests for fuel, the State of Vermont needs to adopt the precautionary principle. Vermont's trees and forests are invaluable for sequestering carbon, preventing soil erosion, keeping our air and water clean, providing habitat for myriad animals and plants, and keeping the state beautiful—which among other things protects our tourist economy. Our forests have far more value alive than cut down for dirty, low-efficiency fuel.

Until such time as there is a solid understanding of how much wood is realistically available without diminishing the long-term health and diversity of Vermont's forests, and scientific analysis of the impact of utility-scale biomass facilities on human health and on climate change is included in any energy plans, we must recommend a moratorium on any new biomass energy facilities.

Our organizations welcome the opportunity for further dialogue with the Working Group on this critical issue, and would be pleased to present you with the scientific analysis underlying our concerns and conclusions. We can be reached as follows:

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*The Center for Biological Diversity is a national, nonprofit conservation organization with more than 320,000 members and online activists dedicated to the protection of endangered species and wild places. The Center maintains its Northeast office in Richmond, Vermont.*

*The Partnership for Policy Integrity (PFPI) is a New England-based organization using science, policy analysis and strategic communications to promote sound renewable energy policy.*

*The mission of the Sierra Club is to explore, enjoy and protect the planet. Vermont Sierra Club has 3,000 members.*