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Sept 10, 2024

Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620

RGS & AWS Supports Issuance of a Certificate of Public Good for Vermont Renewable Gas - Lyndon

Dear PUC Commissioners,

Thank you for allowing us to submit comments on the Public Utilities Commission's review of Vermont Renewable Gas, LLC's petition for a Certificate of Public Good for its renewable energy project in Lyndon, Vermont under Section 248(j). We respectfully ask that the petitioner's request for a Certificate of Public Good be expeditiously granted.

For over 60 years, Ruffed Grouse Society and American Woodcock Society (RGS and AWS) has been uniting conservationists to improve wildlife habitat and forest health for ruffed grouse, American woodcock, and all forest wildlife. We promote stewardship of our forests, our wildlife, and our future. We envision landscapes of diverse, functioning forest ecosystems that provide homes for wildlife and opportunities for all people to experience them. Ruffed grouse are bellwethers of forest condition; they can only persist in healthy, diverse forestlands. These same forests clean the air, filter water, and support local communities. We work with government agencies to restore wildlife habitat diversity using science-based conservation approaches.

Ruffed Grouse Society and American Woodcock Society and our Green Mountain Chapter are dedicated to creating healthy forest habitat for the benefit of ruffed grouse and American woodcock, and all forest birds and wildlife. Forest habitats are by nature ephemeral. Today, young forest habitats are created almost solely through sustainable forest management – the intentional harvesting of trees based upon science-based silviculture methods.

Numerous wildlife species that require forest habitat diversity are declining and identified in Vermont's Wildlife Action Plan as Species of Greatest Conservation Need, including ruffed grouse, American woodcock, Golden-winged warbler, and New England cottontail. Vermont's Wildlife Action Plan identifies the decline of forest habitat diversity as a threat to conserving the state's biodiversity and indicates conservation cannot depend upon natural disturbance events alone to create these habitats.

Ruffed grouse, American woodcock and other key bird and wildlife species like Golden-winged Warbler, Olive-sided flycatcher, Willow flycatcher, Chestnut-sided warbler largely rely on the informed, elective decisions of private landowners harvesting timber as a fiber source to assure the continued presence of their habitat and thus their existence. In Vermont's Northeast Kingdom, there are unique species that do not exist

elsewhere in the state that also rely on young forest habitat. These species include spruce grouse, the Canadian lynx, and the gray jay. Effective management strategies on private and public lands in the Northeast Kingdom have restored the habitats and expanded the ranges of these species. These species were extirpated from the Vermont landscape for much of the 20th Century.

Vermont is fortunate that of its nearly 6.2 million acres, over 2.5 million acres are enrolled in the state's Use Value Appraisal (UVA or "Current Use") program. Just as with most other Current Use participants growing crops on their lands, timberland owners rationally respond to market incentives for the harvest and sale of timber from their lands. If strong markets do not exist for both higher grade timber products (i.e. lumber and veneer) as well as lower grade timber products (i.e. pulp wood and biomass chips) it is challenging to create and sustain adequate wildlife habitat. Unfortunately, most forest owners cannot afford to manage wildlife habitat without market incentives. Because in many cases most of a harvest may be low-grade (often 70% or more), strong low-grade markets are critical.

Vermont Renewable Gas – Lyndon presents a unique value proposition to the Northeast Kingdom region. We support the project for several important reasons, and we believe that you should too. First, the renewable energy and biochar that this new facility will produce create new market opportunities for turning low-grade products associated with even-aged silviculture into value. This will create a long-term opportunity for wildlife habitat creation and climate-related biodiversity outcomes, thus assuring a lifeline for species in the region. This is ever more important as traditional purchasers of harvest residues like pulp mills and biomass plants close or curtail operations.

The facility presents numerous environmental benefits beyond wildlife habitat creation alone. VRG – Lyndon will provide greenhouse gas reduction and carbon sequestration benefits to the whole region through displacing non-renewable electricity on Vermont's power grid, by returning carbon back to local soils as biochar, and stimulating climate-oriented silviculture. The long-term capacity of our forest ecosystems and long-living products like biochar to sequester and store carbon depend in large part on the resilience, adaptive capacity, and utilization strategies of a vibrant working lands economy that includes a healthy timber industry.

Additionally, the project will create rural economic opportunity. While RGS and AWS' mission is primarily one of conservation, there is value in promoting the economic vitality of the communities which steward wildlife habitat. VRG – Lyndon will create up to 12 well-paying jobs at the new facility and protect several additional jobs in the Northeast Kingdom's working lands economy. The financial commitment that Vermont Renewable Gas, LLC is making to the region in the form of substantial capital investment should also not be overlooked. Caledonia, Essex, and Orleans Counties will experience the greatest benefit from this new Facility. These counties have historically been economically challenged. The project will also stimulate rural revitalization in the form of payments for harvest residues which will be reinvested by the individuals creating wildlife habitat. This assures the continued cycle of wildlife habitat protection.

Vermont's wildlife relies on the continued presence of a strong, resilient forest economy. We endorse new, innovative concepts like Vermont Renewable Gas that contribute to that economy's continued viability and

strength. With increased monetary costs for practicing silviculture coupled with the stressors of a changing climate, we need to think innovatively. Our state regulators need to encourage entrepreneurs to invest in Vermont's clean energy future and in the economic vitality of the Northeast Kingdom. Vermont Renewable Gas presents numerous values to the region that go far beyond the benefits of its capacity to generate clean energy alone.

For all the reasons above, we strongly ask for your support for a Certificate of Public Good for the Vermont Renewable Gas project. On behalf of our members and supporters, we thank you for your careful consideration and action to support healthy forests, abundant wildlife and promoting a conservation ethic in Vermont. RGS & AWS would be happy to comment further or address questions on these considerations in your future deliberations.

Sincerely,

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