

In its Order dated 10/27/2016 in Docket 8550, the PUC recognized that woody biomass might not meet the statutory definition of “renewable” as it might not be regenerating at a rate greater than its harvest rate:

However, in the case of woody biomass, there is a potential for the resource to be consumed faster than its natural regeneration rate, depending on the manner in which it is harvested and procured. In the case of a resource whose consumption and regeneration are relatively balanced, it is possible that a resource may have met the statutory definition of renewable at one time but may no longer meet it now or in the future if there is a change in the balance between consumption and generation. Thus, for such a resource, the statutory standard of Section 8002(17) necessitates a periodic reevaluation of whether the resource continues to meet that standard. (3)

Later in the order, the PUC:

directe[d] Board staff to convene a workshop to discuss how the Board should treat other biomass resources under the RES, including whether there is a basis for them to be automatically qualified, whether they should be reviewed on a case-by-case basis, or whether the Board should adopt applicable standards to ensure they meet the statutory requirements. (4)

This workshop was never convened.

There is strong evidence that Vermont forests are *not* regenerating at a rate faster than they are removed. To avoid this inconvenient truth, projects such as the proposed Lyndon Biomass plant claim that they only use wood that is harvested sustainably and within a small area around the plant, thus ignoring the deforestation that occurs elsewhere in Vermont. These arguments also fail to consider that the climate crisis itself will likely increase Vermont forest loss in the future through increased drought, wildfire, insect damage, and disease.

Before the Lyndon biomass plant receives a CPG, the PUC must determine if woody biomass in Vermont is indeed regenerating at a rate higher than the removal rate, and must clearly explain how future forest losses will affect the *renewable* designation of plants like the proposed Lyndon biomass plant.

The combustion of biomass emits CO₂. While it could perhaps be argued that high-temperature ablative pyrolysis processes don't *combust* woody-biomass, these processes still emit large amounts of CO₂ depending on factors such as temperature, time, and pressure. The Vermont DEC does not regulate or consider CO₂ when issuing air-quality permits. It falls to the PUC to understand how many thousands of tons of greenhouse gases this plant is expected to emit each year, and it must understand this at the facility level, without any accounting systems that rely on carbon storage and sequestration that occur elsewhere and which would occur anyway, irrespective of the plant.