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| General Public Comment |                             |                   |           |   |
| 10/04/2024             | Lipton, Cheryl Joy [PUBCOM] | see attached file | Filed     |  |

## COMMENT ON CLEAN HEAT STANDARD TREATMENT OF WOODY BIOMASS

To: PUC Docket No. 23-2220

Members of the Clean Heat Standard Technical Advisory Group  
VT Public Utility Commission

From: Cheryl Joy Lipton

Date: October 3, 2024

Dear Members of the CHS TAG of the VT PUC,

You have the opportunity now to act using scientific research and facts regarding biomass that show clearly and definitively that the burning of wood is not clean. Biomass (all types and especially wood biomass for this application) and biofuels have no place in a clean heat standard.

It is time for Vermont to start acknowledging the facts regarding wood burning and its effects on climate, biodiversity, and human health. This can start here with the PUC joining the VT Department of Health and many others. Hundreds of scientists and economists said in a letter to the leaders of the United States, the EU, Japan and South Korea: "Trees are more valuable alive than dead both for climate and for biodiversity. To meet future net zero emission goals, your governments should work to preserve and restore forests and not to burn them."

Here are some bullet points on facts that you have already received detailed and complete studies and references on.

- Burning wood is not carbon neutral. If biogenic carbon emissions were included in emissions accounting, biomass would not be considered eligible as a clean heat measure.
- [https://www.epa.gov/sites/default/files/2021-04/documents/emission-factors\\_apr2021.pdf](https://www.epa.gov/sites/default/files/2021-04/documents/emission-factors_apr2021.pdf)
- The IPCC does not say that burning wood is carbon neutral. Any Greenhouse Gas (GHG) emission impacts the climate, no matter what the origin of the GHG is.
- Increases in wood burning are negatively impacting forest health
- Increases in wood burning are not allowing the increase of rare mature and old growth forests, which the USFS is now addressing.
- Increasing wood burning is an environmental justice issue as well as an ecological justice issue.
- Burning wood exacerbates Climate Change.
- Burning wood increases biodiversity loss and the Biodiversity Crisis.
- Harvesting wood to burn increases flooding, damage to rivers and streams, and impacts to people living in flood prone areas.
- Burning wood is not renewable in any time frame that matters in addressing the issues of climate and biodiversity. Any renewability of wood is in the order of centuries, not years.

Regarding health: In testimony to the Senate on the Clean Heat Standard, Jared Ulmer of the VT Department of Health stated that reducing home heating emissions, especially from biomass, is good for health. You can see his testimony to

the Biomass Task Group on the June 29, 2022 recorded video, and to the VT Senate Natural Resources and Energy Committee on January 27, 2023. Jonathan Buonocore, Assistant Professor, Environmental Health - Boston University School of Public Health, shared a letter with the VT Climate Council discussing the negative impacts of burning biomass. He states: “The increasing role of gas and biomass and wood emissions in the health burden of PM2.5 exposure indicates that swapping one air pollution-emitting fuel source for another is not a pathway to a healthy energy system. Our work demonstrates that health can be considered in energy decisions, health and energy policy are inextricably linked, and that inclusion of health in energy policy may be necessary for true primary prevention of a large portion of disease burden in the U.S. New energy infrastructure that is installed now will likely be operational for decades— likely ‘locking in’ their health impacts along with their GHG emissions for decades [40–42]. This means that deployment of zero-emission renewable energy sources now may be necessary to continue on a path toward a healthy energy system, and to avoid changes to the energy system that will become ‘regrettable assets’ in the future [40–42]. Environ. Res. Lett. 16 (2021) 054030 J J Buonocore et al

<https://outside.vermont.gov/agency/anr/climatecouncil/Shared%20Documents/BUONOC~1.PDF>

The facts that you’ve seen in other submissions to this case prove that burning wood produces emissions that cause climate change and harm human health, among other negative environmental impacts of logging forests that include habitat loss, flooding, and landslides. You’ve been provided showing that. I do not need to duplicate information by including peer reviewed research articles and letters offering the same or similar data that has been provided by Nick Persampieri, Pike Porter, Laura Haight, and others. I concur with them on their comments and submissions.

For Vermont to include burning biomass as an option in its Clean Heat Standard is difficult to understand, considering the fact that Vermont was one of the states to sue the US EPA over unhealthy emissions standards for residential wood-burning stoves, including so called Advanced Wood Heating. There is one legitimate advantage to burning wood biomass for heat in Vermont, and that is to provide jobs to those in the logging profession. Proponents of wood burning need to be honest and clear about this, though, admitting that it is good for providing these few jobs, and that is the deciding factor, elevated over the fact that it also emits pollution affecting climate and human health. Burning wood gives the wood products industry and the forestry community another reason to log trees, aside from durable wood products. The problem with this, though, is just the same as the problem with mining for coal. It is unhealthy and damaging. People in the coal industry must transition to other employment and people must also stop harvesting wood for burning.

It is important to be honest with Vermonters and relate the actual reasons for including biomass in this Clean Heat Standard. It has become a political issue, ignoring the scientific body of knowledge. When any entity actually investigates the burning of biomass with an open mind and using current scientific data, they recommend discontinuation of biomass burning. This happened in the Agriculture and Ecosystem Subcommittee of the Vermont Climate Council (VCC), and again in the Biomass Task Group. I can only assume that it is due to political pressure that the recommendations were not allowed into the Climate Action Plan when the VCC rejected both recommendations and pathways. The biomass industry is just as damaging to human and environmental health and climate as the coal industry, and we need to move away from both, as they are both not clean. Biomass and Biofuels should be removed from the clean heat standard. To act responsibly, Vermont needs to stop incentivizing the burning of wood for any reason.

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