

H. 740: Relating to the greenhouse gas inventory and registry
February 4, 2026

Representatives,

On January 13, 2026, Secretary Moore acknowledged the "growing concerns around public health, specifically the air quality concerns that are starting to emerge more and more frequently both here and in western states that effect our air quality"

(<https://www.youtube.com/live/jezxtuz2ka4?si=p-IW2k7xW6b7I1Um&t=265> (minute 4:25))

On February 4, 2026, Mr. Duval and others mentioned that we need to understand and lower both energy costs and indirect energy costs for Vermonters. Mr. Duval also expressed concern that the EPA would no longer consider the health costs of air pollution, "the value of human life, the health costs related to asthma and other respiratory diseases will be treated as

zero." (<https://www.youtube.com/live/4xhfjTrdqZg?si=JlqNwYa7Akff7-iU&t=1924>)

I share Mr. Duval's concern. I share Secretary Moore's concern. But I don't believe the Vermont legislature shares these concerns. The state legislature, the PUC, the Department of Public Service, and even the House Energy and Digital Infrastructure Committee all currently ignore the profound health costs related to asthma and other respiratory diseases resulting from wood combustion and treat these costs as zero. The PM 2.5 and VOCs found in forest fires cause the same health harms as the PM 2.5 and VOCs from wood stoves, McNeil and Ryegate.

The Vermont Dept of Health estimates that **wood smoke costs Vermonters between \$105M and \$238M annually in health related costs, about 30X more than all fossil fuel (and PFAS) health related incidents combined.** According to the Vermont Dept of Health, **Wood smoke kills upwards of 25 Vermonters annually.** The Clean Heat Standard

Technical Advisory Group found that the health harms from burning cord wood was so great that they recommended excluding wood stoves as a clean heat measure from the

CHS. https://outside.vermont.gov/agency/anr/climatecouncil/Shared%20Documents/VDH_WoodHealth_June29_2022.pdf

Nowhere in your support of the subsidizing wood combustion for electricity and heat is there any mention of these exorbitant health costs and health harms. ANR, apparently with the tacit approval of the House Energy and Digital Infrastructure Committee, won't even begin a rule making process to accurately count GHG emissions from biogenic sources. In the electricity sector, accounting for stack emissions at Ryegate and McNeil is a simple as reading the continuous emissions monitoring system (CEMS). These two stationary sources emit between 600,000-700,000 tons of CO₂e annually. They also dump over 7 tons of PM 2.5 into the air.

It costs Vermont rate-payers almost twice as much to subsidize the energy produced at Ryegate and McNeil than that energy would cost on the ISO-NE on an annualized average: roughly \$100/MWh compared with \$56/MWh. Because the ISO-NE grid has a lot of nuclear and wind energy, **the energy produced at Ryegate and McNeil are 6 times more GHG polluting than the energy produced on the grid.**

Vermont should not be promoting and subsidizing wood for energy since burning wood is costlier, produces more GHGs, and more is harmful than almost all available alternatives.

The rule clarification and funding request found in H 740 is important. However, it is more important to direct ANR to stop ignoring the statutes that require it initiate rule making for §582(g) or the rules the §593 of the GSWA. Your refusal to address the health and climate costs of burning wood is literally killing Vermonters. Please make these changes to H740:

(e) Rules.

(1) The Secretary ~~may~~ shall adopt rules to implement the provisions of this section and shall review existing and proposed international, federal, and State greenhouse gas emission reporting programs, shall adopt the IPCC or another established reporting protocol, and make reasonable efforts to promote consistency among the programs established pursuant to this section and other programs, and to streamline reporting requirements on greenhouse

Sec. 2. RULEMAKING

On or before March 1, 2027, the Secretary of Natural Resources shall submit to the Legislative Committee on Administrative Rules proposed final rules for greenhouse gas reporting as required under 10 V.S.A. §582(e)(2) and § 582(g).

Please also draft legislation that would end the requirement that electric utilities purchase power from Ryegate, ensure that Efficiency Vermont and other EEU's are not subsidizing wood heating systems and instead direct that money toward weatherization and clean heating systems such as heat pumps.

Thank you.

Pike Porter