

VRG Wood-Chip Procurement & Harvesting Plan

Vermont Renewable Gas (VRG) | Lyndon, Vermont | April 21, 2026

1. Purpose & Scope

1.1 Purpose

Ensure that all forest-derived wood chips supplied to the VRG facility are sourced from harvests that comply with Vermont's mandatory biomass harvesting and procurement standards, as required under 30 V.S.A. §248(b)(11)(C) and 10 V.S.A. §2750, and that such compliance is demonstrated consistent with Vermont's Voluntary Harvesting Guidelines (VHGs) and the Biomass Renewable Energy Standard (BRES).

1.2 Scope

This procurement and harvesting plan (Plan) applies to all forest-derived chips delivered under VRG contracts (including tops, limbs, low-grade roundwood, and residues) by establishing supplier expectations, verification pathways, and documentation requirements consistent with state guidance and BRES requirements.

1.3 Authority & Basis

This Plan is grounded in the following:

- 30 V.S.A. §248(b)(11)(C): Requires compliance with harvesting procedures and procurement standards ensuring long-term forest health and sustainability.
- 10 V.S.A. §2750 and §2751: Directs FPR to develop VHGs and the Biomass Renewable Energy Standard (BRES).
- Vermont Biomass Renewable Energy Standard (BRES): Applies to Tier II projects; requires UVA enrollment or equivalent forester certification, AMP compliance, and land-conversion avoidance.
- Appendix B — Voluntary Harvesting Guidelines (Biomass Energy Development Working Group, 2012): Water, soils, biodiversity protections; residue retention; monitoring.
- Voluntary Harvesting Guidelines for Landowners in Vermont (DFPR, adopted 2015 under Act 24): Operational guidance; AMP integration; project-specific review for power generation supply.
- Model Wood Procurement Standards (2012 report): Adoption, verification, land-conversion checks, clear contracts, and state natural-resource review for large users.
- UVA Program / Current Use Manual: Regulatory forest management standards referenced in the BRES; forms the minimum floor for procurement compliance.

2. Procurement Standards

2.1 Vermont Wood Sources

For wood sourced from forestland in Vermont, suppliers must satisfy one of the following two pathways:

- Pathway A — UVA Enrollment: Forestland is enrolled and in good standing in Vermont's Use Value Appraisal (UVA or Current Use) Program. Landowners enrolled in UVA will not

be required to amend an existing approved forest management plan solely to sell wood to VRG.

- Pathway B — Licensed Forester Certification (Non-UVA Land): A Vermont-licensed professional forester certifies that: (i) the harvest area that is producing the wood feedstock complies with the UVA Management Plan standards applicable to the harvest; (ii) all Vermont Acceptable Management Practices for Logging Jobs are followed; and (iii) all other applicable Vermont forestry-related laws are satisfied.

2.2 Out-of-State Wood Sources

For wood sourced from New Hampshire or other jurisdictions outside Vermont, a licensed or SAF certified forester must certify in writing that:

- The harvest area that is producing the wood feedstock complies with Vermont UVA Management Plan standards applicable to the harvest; and
- All applicable state and local forestry and water quality related laws within the relevant jurisdiction are followed.

2.3 No Land Conversion

No wood will be procured from forestry operations on land being converted from forest to non-forest.

2.4 Supplier Diversification

VRG will actively promote a diversification of wood suppliers from within the project woodshed to reduce concentration risk and support regional forest health.

3. Harvest Standards

The following harvesting standards are intended to ensure that harvests supplying woodchips to the VRG facility will follow practices that ensure long-term forest health and sustainability through consistency with practices reflected in the Voluntary Harvesting Guidelines, Biomass Renewable Energy Standard and Use Value Appraisal Program.

3.1 Down Woody Material (DWM) & Legacy Features

VRG recognizes the ecological importance of down woody material (DWM) and standing legacy features — snags, cavity trees, and large-diameter legacy trees. These features support soil productivity, nutrient cycling, wildlife habitat, and long-term forest health. The forester of record will use best professional judgement when incorporating these items into stands subject to UVA management plans.

Down woody material — soil productivity (VHG §4.3). The forester of record will plan harvests to retain and distribute down woody material across the site consistent with VHG §4.3 guidance and any existing UVA forest management plans. In stands harvesting one-third or fewer of standing trees, at least one-fifth of harvested tree tops should be retained on site; where more than one-third of trees are removed, at least one-third of harvested tops should be retained.

Stumping. Stumping of forested stands — defined as the mechanical removal of stumps and root systems for biomass — shall be prohibited under VRG supply contracts.

Snags, cavity trees, and legacy features (VHG §§5.3–5.4). The forester of record will identify and plan for the retention of snags, cavity trees, and legacy trees prior to commencing harvest operations, consistent with any existing UVA forest management plans. As a planning target drawn from VHG §5.3, harvests should retain a minimum of four snags or cavity trees per acre in a diversity of size classes, including, where available, at least one snag exceeding 24 inches DBH per acre. Large legacy trees — living trees of 24 inches DBH or greater — should be retained where present unless the forester of record documents a specific silvicultural or safety basis for removal.

Down woody material — habitat (VHG §5.4). Existing coarse woody material — particularly large (18 inches or greater in diameter), hollow, or rotten logs and rotten stumps — will be avoided and protected during logging and cleanup operations, consistent with any existing UVA forest management plans. Where woody material is sparse, the forester of record may consider leaving newly cut logs on the site, with an aspirational target of three to five stems at least 18 inches in diameter and ten stems at least 14 inches in diameter per acre, each at least 16 feet long, consistent with VHG §5.4 guidance and existing UVA management plans.

Forester-of-record documentation. The Harvest Information Sheet (HIS) will include a DWM and legacy-feature attestation signed by the forester of record that addresses: (i) whether low-fertility or sensitive site conditions is anticipated to warrant enhanced DWM retention; (ii) any planned snag/cavity tree retention approach; and (iii) whether any legacy trees exceeding 24 inches DBH are likely to be removed, and if so the silvicultural or safety basis. Safety justifications should be specific to identified trees or stands.

3.2 Old Forests and Late-Successional Stands

VRG recognizes that Vermont's old forests are rare and ecologically irreplaceable resources, as described in VHG §5.5. Consistent with the VHG's guidance to "preserve the integrity of existing old-forest stands," VRG will implement the following sourcing practices:

Identification. The licensed forester of record will identify whether old-forest conditions or characteristics are present within a proposed harvest area prior to commencing operations, consistent with any existing UVA management plans. For purposes of this plan, old-forest indicators — drawn directly from VHG §5.5 — include: (i) hardwood trees exceeding 150 years of age for most forest types (100 years for balsam fir; 150 years for Eastern hemlock); (ii) complex stand structures with broad distributions of tree diameters, multiple vertical vegetative layers, natural canopy gaps, and abundant down wood in all stages of decay; (iii) numerous large standing dead trees; and (iv) forest floor pit-and-mound topography with thick humus and minimal evidence of prior human activity. Presence of multiple indicators in combination is the relevant test; no single indicator is determinative.

Avoidance preference. Where a forester of record identifies stands exhibiting old-forest conditions, the VHG guidance to "consider not harvesting at all" should be communicated to the landowner. VRG encourages suppliers to establish small reserves or extend harvest rotations in such old forest stands, consistent with VHG §5.5.

HIS attestation. The Harvest Information Sheet will address whether old-forest indicators as described above were identified within the harvest area, and if so, what avoidance or retention measures will be applied.

3.3 Mitigating Impacts to Sensitive Areas, Habitat and Aesthetic Values

VRG will implement the following to mitigate harvesting impacts to these resources.

Residue retention and equipment restrictions as appropriate for protection of sensitive areas, as determined by the forester of record and consistent with UVA Management Plan prescriptions.

Adherence to Vermont's Acceptable Management Practices (AMPs) for water quality on all logging jobs.

Consistent with the UVA Program standards, identification and protection of wetlands, streams, riparian buffers, rare, threatened and endangered plants and animals, and state-ranked S1/S2 natural communities. Identification and consideration of specific wildlife habitat (e.g., deer wintering areas, vernal pools, mast stands, etc.) where such features are found.

Practices that minimize litter-layer disturbance, retain stumps/roots, and retain sufficient woody debris (including down woody material in stream buffers and other retention areas) to sustain soil productivity and habitat. The amount and distribution of retained material will be determined on a harvest-specific basis by the forester of record.

Harvest planning and practices to reduce the potential for introduction and spread of non-native invasive plants and pests.

Harvesting practices that maintain adequate residual stocking, species composition, and structural diversity to support natural regeneration and long-term forest productivity, consistent with UVA standards and professional forestry practice.

Harvest layouts and strategies that consider visual impacts along public roads, trails, and recreational areas.

Proper close-out and stabilization of roads, trails, and landings.

Adaptive management to adjust harvest planning and practices based on advancements in forest science.

3.4 Carbon & Climate

VRG aligns with Vermont's emphasis on sustained forest productivity and adaptive management. Silvicultural treatments prescribed under UVA standards — including species-composition maintenance, residual stocking requirements, and AMP implementation — provide the primary mechanism for addressing climate-related stressors, consistent with VHG §6.1. VRG will reference current FIA growth-versus-removals data in its PUC filings to substantiate long-term sustainability.

4. Record Keeping

4.1 Record Keeping Requirements

VRG will require concise, standardized documentation for all supply contracts. Records must be retained for a minimum of four (4) years.

- **Harvest Information Sheet (HIS)** attached as **Appendix A**: Location (town and state/jurisdiction), harvest type, dates, forester of record, AMP compliance, attestation of compliance with this Plan, and Parcel SPAN. If the parcel is not enrolled in UVA, the HIS will be accompanied by a forest management plan and map that were developed by a licensed forester and that meet the UVA Program's "Forest Management Plan Standards" specific to the stands to be harvested.

- Verification Evidence: UVA enrollment confirmation OR licensed forester certification letter (Pathways A or B).
- Chain-of-Custody Statement: Traceability from harvest to delivered chips.

4.2 Roles & Responsibilities

- VRG: Sets procurement standards; reviews and retains documentation (minimum 4 years); maintains traceability and reports compliance to ANR/PUC as required.
- Timber Harvesters: Ensure harvests comply with BRES requirements (UVA enrollment and forester certification); gather and submit all required documentation; maintain traceability; notify VRG of any material changes in harvest plans or parcel status.
- Licensed Forester: Plans and executes harvest consistent with UVA Management Plan standards, AMPs, and applicable VT forestry laws and the harvest standard contained in this Plan; provides written certification of compliance with this Plan via the Forest Certification Sheet and advises on site-specific protections including DWM, stocking, and regeneration.
- ANR/FPR (as applicable): Provides guidance on sensitive resources when identified; conducts county forester compliance inspections on UVA-enrolled parcels; appears as party in §248 proceedings and reviews VRG compliance filings.

4.3 Continuous Improvement & Updates

VRG will adhere to the following measures aimed towards achieving continuous improvement of its procurement practices and the harvesting of woodchips supplied to its facility.

- Annual Check-In with key suppliers to review updates to VHG, AMPs, UVA standards, BRES, or state guidance.
- Training Signals: Preference for suppliers with LEAP/Master Logger credentials or equivalent.
- Template Refresh: VRG will update HIS and contract language as guidance evolves, including any finalized FPR procurement standards under 10 V.S.A. §2751.
- FIA Monitoring: Every ten (10) years from the date of the facility's commissioning, VRG will review FIA growth-versus-removals data for the project woodshed and update its regional sustainability assessment.

4.4 Addressing Non-Compliance

- If a timber harvester supplying wood chips to VRG does not adhere to one or more required criteria items within this Plan, VRG will provide the harvester with written notice of its failure to comply. A copy of such written notice will also be provided to the forester of record.
- If a timber harvester fails to adhere to one or more required criteria items within this Plan for a second time, VRG will provide the harvester with written notice of its failure to comply. A copy of such written notice will also be provided to the forester of record. The timber harvester and forester will be required to agree to a written remediation plan with VRG before any further wood-chip deliveries will be accepted by VRG.

- If a timber harvester fails to adhere to one or more required criteria items within this Plan for a third time, VRG will explicitly notify the timber harvester that they are prohibited from providing any further wood-chips to the VRG facility.