

## **Biomass Power Association Comments to EPA Biogenic Carbon Science Advisory Panel**

My name is Carrie Annand and I'm the executive director of the Biomass Power Association. Our members across the country are standalone biomass power facilities that generate electricity using low value organic materials like forestry residues and agricultural byproducts.

Without biomass power plants, many of these materials would go unused. They would remain on the forest floor posing a forest fire risk. In places like the West, where there are millions of dead trees due to the pine beetle epidemic and drought, biomass is an important outlet for disposing of dead fibers. Without biomass, in some cases the fuels my members use would be openly burned, which can lead to poor air quality in places like California's San Joaquin Valley. Farmers, loggers and foresters in rural areas would lose the extra revenue stream that biomass brings, helping them hire other workers and put the lowest value fibers to use rather than simply decomposing and releasing methane gas.

The price of power has stayed very low for a long time – low enough that some biomass facilities have trouble purchasing fuel and paying their workers. Some have had to go idle, as they can't compete with low priced natural gas.

As we have testified before this panel in the past, the universe of fuels used in our plants is entirely a function of power prices. Energy has and always will be the least attractive market for biomass. So long as power prices remain low relative to the value of sawlogs, pulpwood or, if necessary, the conversion of forest land for development, the economics of our industry limit our fuels to what others might call "wastes." Because these fuels do not conflict with non-energy uses and avoid land use changes, they are what Professor Searchinger and others have characterized as "biofuels done right."<sup>1</sup>

Though derived from various sources, almost all of the fuels used by our industry share certain fundamental characteristics: they (1) are not grown and harvested specifically for energy; (2) do not cause direct or indirect landscape changes; (3) if not used for energy would likely decompose, be landfilled, or openly burned. We urge the Agency and the SAB to consider a default Biomass Accounting Factor of "zero" for these fuels and conclude, as others have, that these fuels are "truly low in carbon."<sup>2</sup> This would be a simple and straightforward way to apply the Framework. It would account for carbon from every biomass power facility in business in the United States today and for the foreseeable future.

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<sup>1</sup> "Beneficial Biofuels—The Food, Energy, and Environment Trilemma," Tilman et al., pg. 270.

<sup>2</sup> Letter from Cary Institute et al. to Gina McCarthy, February 9, 2015, pg. 2.

Recognizing the carbon benefits of biomass may not have an immediate impact for my members on the federal level. But states look to the EPA and its scientists for guidance, and the actions of this panel – or the inactions – can have vast and unintended consequences.

This is an important and challenging mission that has been taken on by the panel, to determine how to account for carbon from so many varied fuel sources being used in so many different ways. It is amazingly complex. As the panel continues to debate how to count carbon, biomass power facilities continue to lack clarity despite overwhelming agreement in the scientific community of the benefits of using residues for power.

Biomass can and should be a part of the United States' efforts to combat climate change. It's been more than six years since this panel was convened to explore how to account for carbon from biogenic sources. We ask, when it comes to residues, that you keep it simple and easily applicable to the real world uses of biomass.