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January 25, 2012

Dr. Holly Stallworth  
Designated Federal Officer  
Science Advisory Board  
US Environmental Protection Agency  
1300 Pennsylvania Avenue, NW  
Washington, DC 20004

Dear Dr. Stallworth:

The Biomass Power Association respectfully submits the following written statement regarding issues before the Science Advisory Board Biogenic Carbon Emissions Panel.

BPA is the Nation's leading voice on the use of biomass to create grid-connected electricity. BPA's members, which do business in some 20 states, utilize a wide range of biomass materials—wood debris, agricultural wastes, and forest by-products—to create baseload, renewable energy. All of these fuels are considered “open-loop” biomass (a defined term under Section 45 of the Internal Revenue code), meaning they are a waste, by-product or thinnings, in contrast to energy crops or “closed loop” biomass.

As we explained to the SAB in October, 2011, our members are grateful both to EPA and the SAB for this thorough and science-based approach to the issue of biogenic emissions. Plainly stated, we support EPA's proposed Framework that treats CO<sub>2</sub> emissions from waste materials as carbon neutral by assigning a biogenic accounting factor (“BAF”) of zero. All available literature on the subject of biomass wastes and byproducts and carbon emissions supports EPA's analysis in the Framework. Emissions of CO<sub>2</sub> from these sources are often called “anyway emissions” because the production, and subsequent carbon emissions, will occur regardless of whether the fuel is combusted in a boiler or left to decay. In an effort to reiterate that fact, we submit the information below.

In the Fall of 2009, Professor Searchinger and others brought to the attention of Congress, in the context of deliberations over the Markey/Waxman Cap and Trade legislation, the fact that in their view, there was a so-called “accounting error” in measuring carbon emissions from biogenic sources. Specifically, Searchinger was concerned that no existing protocol measured “changes in emissions from land use when biomass for energy is harvested or grown.” Searchinger made an important distinction between such feedstocks as “manure or crop or timber residues” where “additional carbon” is actually captured, and “harvesting existing forests for electricity” where such practices add “net carbon to the air.”

In a subsequent analysis co-authored by Searchinger and others, “Beneficial Biofuels—The Food, Energy and Environmental Trilemma,” certain biomass feedstocks were considered favorable from a greenhouse gas perspective. These included perennial plants grown on degraded lands, crop residues, sustainably harvested wood and forest residues, and the biogenic component of municipal and industrial wastes. All of these feedstocks were described by the authors as “biofuels done right” given their “lower life-cycle greenhouse-gas emissions than traditional fossil fuels...” Tilman et al, “Beneficial Biofuels—The Food, Energy and Environmental Trilemma” *Science*, **325**, 270-271. .

In 2010, The Commonwealth of Massachusetts examined the issue of waste biomass and carbon, specifically in the so-called Manomet report in 2010 which looked, in their words, “exclusively at the use of existing low-grade forest resources” [ie the harvesting of natural forests for energy] and not agricultural, or forest residues, or “non-forest based biomass such as wood waste from construction debris, or other sources sometimes considered as biomass, such as municipal waste...”. Manomet at 20 (emphasis added) Indeed, Manomet made clear in that report that had the authors studied biomass residues and byproducts, they would have come to a favorable conclusion: “Thus, all bioenergy technologies—even biomass electric power compared to natural gas electric—look favorable when biomass “wastewood” is compared to fossil fuel alternatives. Manomet at 110.

Other studies have reached a similar conclusion. See for example, a study by the University of Minnesota concluding that waste biomass “incurs little or no carbon debt and can offer immediate and sustained GHG benefits.” Fargione et al, “Land Clearing and the Biofuel Carbon Debt,” *Science* (February 7, 2008). The World Wildlife Fund, in its Position Paper on Bioenergy, supports the use of waste and by-products as a source of bioenergy. WWF Position Paper on bioenergy, June 2008.

Finally, EPA itself has embraced the carbon benefits of biomass waste. In the preamble to the final changes to the renewable fuel standard promulgated in 2010, the Agency found that it

“believes that renewable fuel produced from feedstocks consisting of wastes that would normally be discarded or put to a secondary use, and which have not been intentionally rendered unfit for productive use, should be assumed to have little or no land use emissions of GHG’s.”

BPA, through the Green Power Institute, has engaged Gregg Morris to undertake additional work that shows that for certain waste materials used for energy, CH<sub>4</sub> avoidance actually results in net negative emissions. For purposes of the SAB’s focus, however, the conclusions of the draft Framework—that CO<sub>2</sub> emissions from biomass waste and by-products is carbon neutral—are scientifically sound and grounded in science.

Sincerely,

Robert E. Cleaves  
President & CEO  
Biomass Power Association