



**Spoken comments by Mary S. Booth, PhD, Partnership for Policy Integrity
To SAB Panel on Biogenic Carbon Accounting, October 12, 2016**

I am speaking today to remind the panel that their work is important. This is especially the case now because there are [two pieces of legislation](#) in Congress that, if enacted, would force EPA to treat biomass as carbon neutral.

Burning biomass emits more carbon than fossil fuels at the stack. The most efficient biomass plants emit over 3000 lb/MWh, while new coal plants emit two-thirds of that amount, and new natural gas plants emit less than one-third that amount. Any claim that biomass has net carbon benefits is thus based on the idea that the emissions are offset in some way.

It is urgent that the panel develop a framework that is capable of making clear distinctions among biomass fuels with regard to their net carbon impacts and the degree to which emissions can be offset in meaningful time frames – particularly the 2030 target date of the Clean Power Plan, which is just 14 years away.

So far, the panel has not provided practical guidance. I think a lot of people recognize this is due in part to EPA's failure to provide a clear mandate. However, this failure has encouraged efforts to legislate biomass as carbon neutral.

Since this panel was initially convened, there has been an explosion in the wood pellet export industry. [Tens of millions of tons of trees](#), including [bottomland hardwoods](#), are now being harvested and processed into dried wood pellets to provide fuel for power plants overseas.

The biomass industry wants to develop a market here in the US and has aggressively advocated burning wood pellets as a replacement for coal under the Clean Power Plan. Dave Tenny, President of the National Alliance of Forest Owners, [has taken credit for drafting legislation](#) that would force EPA to treat biomass as carbon neutral. One of the incarnations of this legislation explicitly states that as long as net forest growth in the US is stable or increasing by any amount, biomass should be treated as having zero emissions. This approach was explicitly rejected by your panel. [Scientists](#) and [advocates](#) have widely expressed their disgust with the biomass industry's attempts to trump the science in this way.

Government data shows that treating biomass as carbon neutral directly incentivizes biomass energy. We recently completed an [analysis of Energy Information Administration modeling data for the Clean Power Plan](#). The EIA projects that electricity generation from biomass will be four times higher under the CPP if biomass is treated as carbon neutral than if it is not. Since industrial biomass wastes are already allocated, any increase in generation will be met by burning forest wood, and indeed we already see many biomass power plants that are harvesting trees for fuel. The expansion in bioenergy is not projected to displace any coal – indeed, EIA projects that there will be more coal burning, and less generation from solar, if bioenergy generation increases.

It is really urgent that the Science Advisory Panel provide clear guidance on how to evaluate net emissions from bioenergy over the timeframe of the Clean Power Plan. Modeling outcomes become less and less certain over longer timeframes, especially given that forests must be allowed to grow back completely without re-cutting for carbon offsetting to occur. Focusing on carbon impacts over the next one to two decades is the most practical and implementable solution, and the solution that is most meaningful for the climate.