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COMMITTEE ON NATURAL RESOURCES

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June 18, 2015

The Honorable Gina McCarthy
Administrator
U. S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N. W.
Washington, D. C. 20460

Dear Administrator McCarthy,

I want to first thank you for your leadership and efforts to finalize the Environmental Protection Agency's (EPA) Clean Power Plan (Plan) proposed rule. I am a strong supporter of the Plan's goal to reduce carbon emissions from the power sector. Addressing the impacts of global climate change is the existential crisis of our generation, and EPA's Plan is a step in the right direction for the U.S. to reduce its carbon footprint.

However, I am writing today to express my concern about the possibility that EPA may treat biomass combustion as carbon neutral under the final Plan. In a November 2014 memo, EPA Assistant Administrator Janet McCabe suggested that information used to prepare the second draft of EPA's *Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources* supports the finding that "use of waste-derived feedstocks and certain forest-derived industrial byproducts are likely to have minimal or no net atmospheric contributions of biogenic CO₂ emissions." Furthermore, the memo indicates that EPA is expected to allow states to use bioenergy from "sustainably-derived agricultural- and forest-derived feedstocks" as an approvable element in their compliance plans to meet the Plan.

The McCabe memo can have potentially significant negative implications for the future of our nation's forests. I am not alone in my concerns. A letter submitted to EPA signed by over 70 premier scientists strongly emphasizes their disapproval of the notion that burning biomass instead of fossil fuels would reduce the carbon emitted by power plants. In my state of Virginia, local environmental organizations are concerned that if EPA treats biomass combustion as carbon neutral under the final Plan, it will encourage Dominion Virginia Power to burn wood from forests to help meet its emission reduction obligations under the state plan. Dominion has already converted three of its existing coal plants to run on biomass fuel and has a hybrid energy center that can burn up to 20 percent biomass for fuel. I share the concern of these local groups that Virginia will become known as a state that harvests forests to reduce its dependence on coal, rather than one that develops renewable technologies that clearly reduce emissions, such as solar and wind.

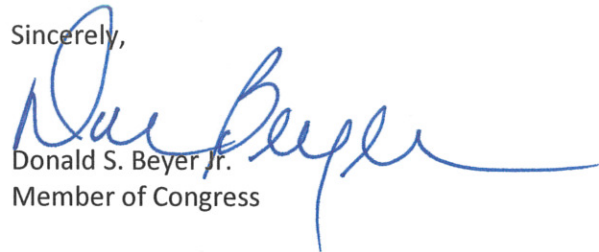
More broadly, I worry about the precedent that this will set for forest management policy in the U. S. and around the world. We have already seen that under the European Emissions Trading System, where biomass combustion has a zero emissions rating, European companies have invested billions to convert

coal plants to plants that can burn wood pellets, leading to an incredible demand for wood. Just earlier this month, the *Washington Post* reported that Europe's climate policies have led to more U.S. trees being cut down as wood pellets are being exported to Europe to meet the demand for woody fuel. More than two dozen pellet factories have been constructed in the southeastern U.S. over the past decade, along with special port facilities in Virginia and Georgia, to ship the wood to Europe. According to a Yale report from January, demand for wood in Europe is so robust that wood pellet exports from the U. S. nearly doubled from 2012 to 2013 and are expected to nearly double again to 5.7 million tons in 2015.

I understand the final Plan rule has been sent to the White House for review, but that the Scientific Advisory Board's (SAB) review of EPA's second draft of the biogenic carbon accounting framework may not be completed by the time the Plan is finalized this summer. I hope EPA will allow for the SAB review process to be completed before including biomass as a compliance strategy. When SAB reviewed and commented on the first draft, it found that quantification of most components of the first draft had "uncertainties, technical difficulties, data deficiencies and implementation challenges" and urged EPA to reconsider the biomass approach proposed and instead employ a scientifically valid system that more accurately accounts for biomass emissions.

It is critical that we make sure the accounting used to estimate net biogenic emissions is scientifically accurate before we implement a policy that might add carbon pollution rather than reduce it. I strongly urge EPA to reconsider classifying biomass combustion as a carbon-neutral compliance method under the final Plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Don Beyer", with a long horizontal flourish extending to the right.

Donald S. Beyer Jr.
Member of Congress