

February 18th, 2015

Gina McCarthy
Administrator
Office of the Administrator 1101A
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Dear Administrator McCarthy:

We are writing to express our concern that under the Clean Power Plan, EPA may inaccurately treat biomass electricity as carbon neutral, that is, as having no net emissions of carbon dioxide, the greenhouse gas most responsible for climate change.

Such a policy threatens forests, because wood is the primary fuel consumed by biomass power plants. Here in Ohio, we have been deeply worried by proposals by power companies to co-fire wood at coal plants or even convert coal plants to biomass. Nine large biomass co-firing or conversion projects have been approved by the Public Utilities Commission in Ohio,¹ projects that would consume millions of tons of wood a year. While these plans have been shelved for the time being, EPA's plan to allow biomass, particularly "sustainably harvested" biomass, to qualify as renewable energy under the Clean Power Plan could change the economic balance of these proposals, making them more feasible. This is not just a theoretical possibility. We have watched with alarm what happened in Virginia, where Dominion Energy has converted the Altavista, Southampton, and Hopewell coal plants to burn wood, and will be co-firing 20% biomass at its new 600 MW Virginia City plant. Reports of pellet industry harvesting of bottomland hardwood forests in the Southeast also highlight the vulnerability of Ohio's treasured and limited forests if EPA makes wood-fired biomass power more viable.

Our groups advocate for the preservation of Ohio's forests, the quality of our air, and renewable energy policies that actually reduce air pollution and greenhouse gas emissions. We are dismayed that EPA would include bioenergy as a means for coal companies to "reduce" their emissions, when this reduction is based on simply not counting the CO₂ coming out of the smokestack. As EPA knows, biomass is not instantaneously carbon neutral. EPA's own modeling shows that burning even forestry residues that would decompose and emit CO₂ anyway has cumulative net emissions that exceed those from coal, creating a carbon debt that takes years to decades to offset. An even longer carbon debt occurs from cutting and burning trees that would otherwise continue

¹ Miami Fort Generating Station Hamilton Cty, OH
W.H. Zimmer Generating Station, Clermont Cty, OH
Conesville Generating Station, Coshocton Cty, OH
Bay View Co-Generation Plant, Lucas Cty, OH
Walter C. Beckjord Generating Station, Clermont Cty, OH
Bay Shore Generating Station, Lucas Cty, OH
Picway Generating Station, Pickaway Cty, OH
South Point Biomass Generation Plant, Lawrence Cty, OH
Killen Generating Station, Adams Cty, OH

to grow and sequester carbon, with massive consequences for forest uptake of carbon dioxide and, most importantly, for forest integrity and ecological function.

Biomass power plants don't just emit greenhouse gases. EPA's own data show that even the best-performing biomass plants emit as much or more particulate matter, carbon monoxide and other pollutants as a similar-sized coal plant. Parts of Ohio have been designated as out of attainment with EPA's 2012 PM_{2.5} standard,² with the coal-fired power sector responsible for a great part of the air pollution burden on Ohio's citizens. Promoting biomass energy under the Clean Power Plan makes no more sense for controlling conventional air pollutants than it does for controlling greenhouse gasses.

Our groups want clean energy, and we want to support EPA in its efforts to reduce power sector emissions, but biomass power is not "clean" and it doesn't belong in the Clean Power Plan. If the Plan counts the electricity generated at biomass power plants and coal plants co-firing biomass, then it must count the CO₂, as well. It is essential that EPA recognize the toll that biomass power takes on greenhouse gas emissions, air pollution, and forests.

Thank you for your consideration,

Nancy Pierce, steering committee member
Athens County Fracking Action Network

Heather Cantino, Board Vice Chair
Buckeye Forest Council

Kathie Jones, Co-Founder
Concerned Citizens of Medina County

Leatra Harper, Managing Director
FreshWater Accountability Project

Carol Apacki, Coordinator
Licking County Concerned Citizens for Public Health and Environment

Nathan G. Johnson, Attorney
Ohio Environmental Council

Nancy Walker
Appalachian Ohio Sierra Club

Lorraine McCosker, Chair, Forests and Public Lands
Ohio Sierra Club

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<http://epa.maps.arcgis.com/apps/MapJournal/index.html?appid=04f3d530f6d34d4ea6b9471ff37e084e&webmap=f297672dd074e4ab5b208aeb21fa52>