



Biomass Power Association Submits Comments on Clean Power Plan to EPA

Revised Biogenic Framework Provides Biomass More Certainty to Contribute to Plan; Questions on Sustainability Remain

Washington, DC – December 1, 2014 – Biomass Power Association (BPA) today submitted [its comments to the Environmental Protection Agency \(EPA\) on the Clean Power Plan](#), the Agency’s strategy for reducing carbon emissions in each state. The comments highlighted the significant environmental benefits provided by biomass power as recently recognized by the EPA in its revised [biogenic carbon framework](#). The letter also encouraged EPA to carefully consider the sustainability questions left unanswered in its framework to ensure the maximum possible contributions by biomass to the Clean Power Plan.

“Biomass power represents 22% percent of the Nation’s renewable energy supply, according to the U.S. Energy Information Administration (EIA). Biomass qualifies as ‘renewable’ in virtually every state renewable portfolio standard currently in force,” wrote BPA President Bob Cleaves in the letter. “The McCabe Memorandum and the accompanying Revised Framework for Assessing Biogenic Carbon Dioxide Emissions from Stationary Sources, issued earlier this month, provide important clarity on a number of issues and represent a significant step forward in providing states an important renewable, baseload energy resource long recognized by countries worldwide for inclusion in their carbon reduction strategies.”

The EPA’s revised framework, issued November 19 after several years of litigation, provided clarity for how biomass would factor into the Clean Power Plan, declaring that waste-derived materials, biogas and forest-derived industrial products are “likely to have minimal or no net atmospheric contributions of biogenic CO₂ emissions, or [could] even reduce such impacts, when compared with an alternate fate of disposal.” The original draft of the Clean Power Plan released in June had left unresolved the question of how the Agency would count biomass. Accompanying the framework was a memorandum to states from EPA Acting Assistant Administrator Janet McCabe providing further detail on the inclusion of biomass in each state’s carbon reduction strategy.

In its comments, BPA also requested clarity on a few important points in its final Plan:

The comments asked the Agency for further clarification in the final Plan that non-forestry cellulosic materials—like urban wood, wood-derived construction and demolition debris, and railroad ties—be specifically included in the definition of “waste-derived feedstocks” since these organic materials do not cause land use changes and do not deplete carbon stocks.

Regarding EPA’s decision to include in the Plan “sustainably-derived” forest-derived feedstocks, BPA urged EPA to defer to existing state laws that promote and protect healthy forests. “States have managed their forests using sustainable land management practices,” Cleaves wrote, “. . . and the Plan should recognize that EPA does not have the expertise or resources to set or enforce sustainability standards.”

Finally, BPA encouraged EPA to clearly state that biomass power plants that use feedstocks covered by the McCabe Memorandum are exempt from regulation under the Clean Power Plan.

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Biomass power is a \$1 billion industry with 80 facilities in 20 states and provides over 15,500 jobs nationwide. Power plants are predominantly located in rural communities, creating thousands of jobs and producing millions in revenue for small towns. Biomass power is a clean and abundant source of electricity that will allow states to pursue even more aggressive goals for increasing their use of renewable energy in the future.