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May 19, 2015

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

Dear Administrator McCarthy,

Thank you for your leadership and continued efforts to finalize the Environmental Protection Agency's Clean Power Plan. As a strong supporter of this plan, I believe you have laid forth a forward-thinking, flexible, and attainable approach to reducing our nation's carbon footprint. I appreciate your willingness throughout this process to consider public feedback on the draft plan and trust the final plan you develop will establish our country as a global leader on climate change.

I write to share my concern with the EPA's draft proposal to treat waste-derived feedstocks and non-waste biogenic feedstocks derived from sustainable forest or agricultural practices as having zero emissions. As you know, following EPA Assistant Administrator McCabe's November 2014 memorandum, there has been considerable debate regarding this decision, including questions surrounding the science behind it, and the perception that this decision will result in the unsustainable promotion of forest harvesting for energy production.

For example, in a February 9, 2015, letter to the EPA, more than 70 scientists highlight their concerns with this decision, including their view that it would actually increase emissions. They state, "Burning biomass instead of fossil fuels does not reduce the carbon emitted by power plants...In fact, burning biomass degrades facility efficiency and increases day-to-day emissions over emissions when fossil fuels are burned alone."

They go on to point out that "burning biomass that would otherwise continue to absorb and store carbon comes at the expense of reduced carbon storage." In fact, numerous studies have found that it takes decades of forest regeneration to offset these emissions.

Furthermore, decisions we make domestically will unquestionably have an impact on the global community. For example, in advance of the upcoming United Nations Climate Conference in Paris, the U.S. has entered into important carbon emission reduction agreements with both China and India. We

must be mindful that the EPA's accounting rule pertaining to biomass could be applied globally and have a significant impact on decisions related to our world's forests. According to the International Energy Agency, treating bioenergy as carbon free globally, coupled with strong carbon policies, would lead to reliance on woody biomass for 6% of electricity by 2035, and require more than doubling global commercial timber harvest.

As the McCabe Memo correctly notes, "The President's Climate Action Plan highlights the critical role that America's forests play in addressing carbon pollution in the United States by removing nearly 12 percent of the total U.S. greenhouse gas (GHG) emissions each year from the atmosphere." However, I worry the decision to treat biomass as carbon-neutral may have unintended consequences that could actually undermine and inhibit our ability to reduce carbon emissions.

I understand the Scientific Advisory Board Biogenic Carbon Emissions Panel is still reviewing the Framework for Assessing Biogenic CO2 Emissions from Stationary Sources. Until this review is finalized, I believe it is premature to classify biomass as a carbon-neutral compliance method under the Clean Power Plan. I thank you for taking these concerns under review.

Sincerely,



Gerald E. Connolly  
Member of Congress

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