

EPA “Listening Session” on Greenhouse Gas Standards for Fossil Fuel-Fired Power Plants and Refineries

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Statement of Frank Rambo

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I will make one general point, then follow up with a particular concern on that general issue.

The basic claim I want to make today is simple: The performance standards finalized through these rules must make things better. Given the seriousness of the threat climate change poses, the goal of the rules should not be to use the most creative approach to determining the performance standards, nor arriving at the most flexible standards, but to establish standards that truly, reliably reduce GHG emissions. Creativity, flexibility – those might be means to achieve this end, but they are not ends in and of themselves.

One of the issues that worries me about whether these rules will, in fact, make things better is how EPA treats carbon dioxide emissions from burning biomass, particularly woody biomass, and how EPA treats those emissions depends on the position EPA takes on biomass’s “carbon neutrality.”

With Administrator Jackson’s recent announcement that all but promised that EPA would ignore biomass CO₂ emissions under the greenhouse gas regulations for the Prevention of Significant Deterioration permitting program, the Agency appears to be throwing its lot in with this notion put forward by the forest products industry and the utilities that simplistically asserts that all biomass is “carbon neutral,” because trees not only release carbon when burned but also sequester it.

I’m concerned that the Agency may import the same thinking into the New Source Performance Standards rules. This approach is not justified by the current science.

The incentive created by a carbon neutral approach in these rules would result in utilities turning to whole trees to co-fire with coal. This is not a theoretical worry. Duke Energy testified to the

North Carolina Utilities Commission that forest residues are inadequate to meet their co-firing fuel needs.

But more and more studies show that cutting down forests to burn for energy production often increases greenhouse gas emissions. While re-growing trees can eventually recapture the levels of carbon that were released, that process can take anywhere from 30 to 100 years, depending on the fossil fuel that the biomass displaces and the technological processes involved. And it is precisely this time period – the next 30 years or so – that climate scientists generally agree are critical in terms of slowing climate change.

There is a role for woody biomass to play in our energy future. It can be done in a carbon neutral way. For instance, use of some woody biomass, such as wood residues, and wood waste can be carbon neutral. We hope for a regulatory approach that would allow for separating the “good” biomass from the “bad.” A blanket carbon neutral approach to biomass does not allow this differentiation, and thus is unwelcome news for the South, with its bounty of coal-fired power plants and utilities that are already eyeing co-fired biomass as a Clean Air Act compliance strategy.

Forests in the U. S. currently sequester 10% of our annual carbon emissions. They are helping us tremendously in the battle against climate change right now, and they can continue to the next few crucial decades. A free pass on carbon emissions now means that facilities coming under these rules in will rely on standing trees as a fuel source, jeopardizing the very purpose of these rules – to combat climate change.