

Docket ID No. EPA-HQ- OAR-2015-0199

I am pleased for the opportunity submit comments on the Federal Implementation Plan (FIP) of the U.S. Environmental Protection Agency's (EPA) proposed final Clean Power Plan. I support the federal government's efforts to reduce carbon emissions and to combat climate change. However, as a member of the biomass energy industry I am concerned that the USES of these RESOURCES are not being given fair consideration.

The biomass thermal energy sector and the entire biomass value chain needs certainty on the carbon profile of biomass combustion. Through the FIP, EPA has the opportunity to create a clear, simple, realistic and consistent policy that recognizes the environmental and economic benefits of sustainably harvested biomass energy feedstocks.

In its current form the FIP's treatment of biomass resources limits the nation's ability to use all of its domestically available clean renewable energy resources in the effort to combat climate change through the reduction of carbon emissions.

My principal concerns with the proposed EPA approach are:

- EPA's proposed regulation adds more costs to biomass usage through unnecessary recordkeeping, monitoring, tracking and verification schemes, thereby making biomass energy less competitive in the marketplace at a time when fossil fuels are unusually low in price. To increase the use of low carbon energy sources the EPA should be finding ways to decrease—not increase—the cost of their deployment.
- The FIP discusses sourcing biomass only from sustainably managed forest lands as a precondition for eligibility but does not define *sustainably managed*. Such uncertainty also places biomass energy at a competitive disadvantage when compared with other clean renewable energy sources as solar and wind, as well as with natural gas.
- Dedicated biomass systems are not recognized nor are alternative conversion platforms differentiated (stoker, mass-burn, gasifier/fluidized bed) in terms of GHG accounting. Failure to recognize these distinctions is likely to reduce the role that can and should be played by sustainably harvested biomass energy resources.
- Combined Heat and Power (CHP), regardless of source, seems not to be recognized. Yet, CHP is a well-regarded technology for the reduction of carbon emissions.
- There is no consideration of State compliance for “inside-the-fence/self-supply” biomass systems—either within a single party's facility or for a district heating/cooling system; and,
- The EPA fails to recognize the considerable body of definitive research regarding the value of the biomass to capture carbon emissions. The use of best practices in the growth, harvesting and re-growth of biomass resources is an effective, safe and natural form of sequestering carbon.

Add any additional comments in your own voice here.

Through the formulation of the Federal Implementation Plan EPA has the opportunity to lead by example in the deployment of domestically available biomass energy resources; resources that continue to be under-utilized in the United States and are not only capable of reducing carbon emissions but of offering substantial economic benefits particularly for rural communities. Thermal energy consumes over a third of the power produced in the United States and represents a tremendous opportunity to meet the nation's carbon reduction goals but only if it is equitably treated in the FIP.

Add any additional comments in your own voice here.

I appreciate the opportunity to express my thoughts and concerns about the FIP as currently proposed by your agency and encourage you to modify the proposed Plan to reflect the considerable contribution that the deployment of biomass energy systems can make to the nation's efforts to combat climate change through the reduction of carbon emissions.