

From: [Spencer, Stuart](mailto:Spencer.Stuart)
To: [Jackson, Tricia](mailto:Jackson.Tricia)
Subject: FW: Role of biomass in CPP
Date: Tuesday, January 12, 2016 12:40:32 PM

From: Max Braswell [mailto:mbraswell@arkforests.org]
Sent: Tuesday, January 12, 2016 12:33 PM
To: Spencer, Stuart
Subject: Role of biomass in CPP

Stuart – please consider the following information and recommendations on the role of forest-derived biomass as the state moves forward in developing its approach to the Clean Power Plan. The timber and forest products industry fully supports the stated goal of Governor Asa Hutchinson to pursue the least-cost approach when developing the State Implementation Plan. You asked for language that would define sustainability and how to measure it, and assistance with positioning forest-derived biomass as carbon neutral. I believe this information is helpful in doing so.

Forest-derived biomass is carbon neutral where:

- USDA Forest Inventory Analysis data shows that the growth rate of forests is greater than or equal to harvest levels on a broad landscape scale.
 - States should not calculate growth or harvest rates on a state level, as this does not reflect the limitations of forest inventory data, the reality of forest geography and the fact that wood baskets cross state lines.
 - States should also use actual FIA data with a reference point baseline.

Key elements of a simple approach to regulating forest-derived biomass include:

- Recognition that biomass energy will not increase carbon in the atmosphere so long as overall forest carbon is stable or increasing.
- Use of USDA's Forest Inventory Analysis data and established science rather than complex modeling and assumptions.
- Implementation on the broadest possible scale.
- Recognition that forest products manufacturing residuals, harvest residuals and thinnings do not increase and can even reduce overall carbon in the atmosphere.

In regards to the FIP and Model State Plan

To provide maximum options to meet the state's target, the Federal Implementation Plan and the model state plan should recognize use of all forms of renewable energy, including biomass.

- At the same time, EPA must recognize that forest biomass is a low-value forest product that cannot withstand significant added costs on production. Moreover, biomass is expected to represent only a small percentage of products produced from the forest. Nonetheless, biomass production can serve as the market that provides some economic return to the forest owner and the incentive to retain the land in forest.
- By leaving biomass out of the proposed federal plan, EPA sends the entirely wrong message and establishes the impression that biomass is a disfavored source.

- EPA provides little detail on how a state would qualify its use of biomass. We urge EPA in the final plans here to recognize the following:
 - FIA data shows that the growth rate of forests is greater than or equal to harvest levels producing a carbon sink on a broad landscape scale. This is confirmed in the *2016 Second Biennial Report of the United States of America under the United Nations Framework Convention on Climate Change*.
 - There is no need to probe further on issues such as feedstocks, sustainability, or monitoring and tracking.
 - Such complex and expensive processes would be counter to the findings of the *2016 Report* recognizing the importance of markets for retaining this carbon sink.

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