



Ecological Society of America  
1990 M Street, NW  
Suite 700  
Washington, DC 20036

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March 11, 2015

Gina McCarthy  
Administrator, US Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator McCarthy:

On behalf of the Ecological Society of America, the world's largest professional society of ecologists, I write to express concern that the US Environmental Protection Agency (EPA) has credited use of biomass from wood products as reducing carbon emissions. This runs contrary to the agency's own scientific analysis and scientific findings within the ecological community.

The Society is concerned with a November 2014 memo from EPA Acting Assistant Administrator for the Office of Air and Radiation Janet McCabe that would treat wood products as "carbon-free" and credit their usage with reducing carbon emissions. However, peer-reviewed science suggests this action could ultimately undermine federal efforts to deter rapid deforestation, lower carbon emissions and mitigate the effects of global climate change that threaten ecosystems and human health.

A 2012 EPA Science Advisory Board report criticized the method the agency used in its draft framework to account for carbon savings from biomass derived from forest stocks:

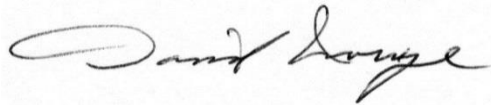
"The agency's use of a fixed reference point baseline coupled with a division of the country into regions implies that forest biomass emissions could be granted an exemption simply because the location of a stationary facility is in an area where forest stocks are increasing. The reference point estimate of region wide net emissions or net sequestration does not indicate, or estimate, the difference in greenhouse gas emissions (the actual carbon gains and losses) over time that stem from biomass use. As a result, the Framework fails to capture the causal connection between forest biomass growth and harvesting and atmospheric impacts and thus may incorrectly assess net CO<sub>2</sub> emissions of a facility's use of a biogenic feedstock."

Our forest systems play a vital role in pulling carbon dioxide out of the atmosphere and provide a number of critical ecosystem services. Conversely, a report from the US Energy Information Agency (EIA) indicates treating woody biomass as carbon free would spur a 70 percent increase in timber harvest. While the EIA report indicates this would generate an additional four percent of electricity from wood products, it would take decades to recover the lost carbon storage capacity.

Additionally, the move could further incentivize other nations to use wood biomass in carbon reduction efforts, further straining tropical forests and other wooded ecosystems that promote species diversity and provide vital resources for human communities, including food, fibers and medicines.

The Society appreciates that the EPA has placed such a high priority towards mitigating the detrimental impacts of global climate change. Moving forward, we hope that ecological expertise can help the agency more accurately quantify effective methods to reduce carbon emissions. We have members ready and willing to serve as a scientific resource in these efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "David Inouye". The signature is fluid and cursive, with a large initial "D" and "I".

Dr. David W. Inouye  
President