

## FINAL BIOMASS SIGN-ON LETTER DELIVERED TO U.S. SENATE ON 8/3/2009

August 3, 2009

To All Members of the United States Senate

Re: Clean Energy and Climate Change Legislation

Dear Senators:

We are members of a network of concerned Americans and environmental groups who work every day to ensure the health of our planet and our communities. Our goals include meaningful progress on climate change. We write because the American Clean Energy and Security Act (ACES) bill passed by the House of Representatives on June 26, 2009, proposed as the template for a Senate bill, has sections that are seriously flawed.

According to David G. Hawkins, Director of Climate Programs, Natural Resources Defense Council in testimony before the Senate Environment and Public Works Committee on July 7, 2009, the ACES bill contains “a large biomass loophole that ignores the global warming emissions related to biomass production and combustion.” In fact, this loophole extends beyond biomass burning, to the incineration of municipal solid waste, construction and demolition debris and other materials to generate what is wrongly referred to as “renewable electricity.”<sup>1</sup> This loophole allows these power plants to generate unlimited and uncontrolled amounts of CO<sub>2</sub>. According to U.S. Department of Energy figures, by 2020 biomass burning will generate 700,000,000 million tons of CO<sub>2</sub> per year. The bottom line is that classifying this burning as a “renewable energy source” means that it is promoted and subsidized by the bill even though CO<sub>2</sub> emissions accelerate climate change.

It is our position that the Renewable Electricity Standard (RES) of any climate change bill should not qualify burning biomass, municipal solid waste, construction and demolition debris, or other materials as a “renewable energy resource.” **When compared to coal, per megawatt, this burning emits 1.5 times the carbon dioxide (CO<sub>2</sub>), 1.5 times the carbon monoxide (CO, a toxic air pollutant), and as much particulate matter.** <sup>2</sup> The latter toxic emissions cause cancer, asthma and respiratory ailments. Incineration and biomass burning to generate renewable electricity also generates toxic ash, drains rivers through the evaporation of large volumes of cooling water, often discharges heated and polluted effluent to rivers, and when wood is used, burns forests thereby decreasing the capacity of the ecosystem to sequester carbon. The large amounts of woody biomass required by these power plants threatens our Nation’s forests, regarded by other parts of the bill as critical “carbon sinks” for their carbon sequestration value. By qualifying this burning as a “renewable energy resource”, the RES replaces burning coal with something worse. While industry argues that incineration is “carbon neutral,” particularly with regard to burning forests, this is a myth. In fact, burning to generate “renewable electricity” adds greenhouse gases to the atmosphere in the critical near-term period. Moreover, this CO<sub>2</sub> will not be reabsorbed before the planet reaches its “tipping point.” According to U.S. EPA, the CO<sub>2</sub> emitted by burning biomass and other materials to generate renewable electricity will not be reabsorbed for hundreds to thousands of years. The U.S. EPA’s April 2009 proposed endangerment finding puts the matter starkly: “... for a given amount of CO<sub>2</sub> released today, about half will be taken up by the oceans and terrestrial vegetation over the next 30 years, a further 30 percent...over a few centuries, and the remaining 20 percent...will take many thousands of years to remove from the atmosphere.” <sup>74</sup> Fed. Reg. 18899, 4/24/2009.

Clearly, the large volumes of CO<sub>2</sub> emissions emitted by burning to generate “renewable electricity” will not be reabsorbed in time to “neutralize” this CO<sub>2</sub>. This is true – regardless of the number of trees planted to replace the wood that is burned. After all, there is a difference in CO<sub>2</sub> absorption capacity between old forests and new growth trees. In an article entitled “The Giving Trees,” Spring 2008 edition of NRDC publication ONEARTH, the author writes: “It turns out forests hundreds of years old can continue to actively absorb carbon, holding great quantities in

storage. Resprouting clear-cuts, on the other hand, often emit carbon for years, despite the rapid growth rate of young trees.”<sup>3</sup>

Senators, we stand ready to support a climate change bill that will implement real reductions in greenhouse gas emissions. But, American taxpayers and rate payers ought not to incur costs for the implementation of a regulatory scheme that ignores the science by classifying biomass burners and incinerators as “renewable energy” when the science shows exactly the opposite.

We seek your assurance that your actions will be based on the EPA science on this matter, and accordingly that you will change pertinent provisions of the House-backed bill (H.R. 2454). Whatever else a climate change bill does, we are sure you will agree that it ought not to harm the environment and human health.

Very truly yours,

BiofuelWatch  
Blue Ridge Environmental Defense League  
Cascadia’s Ecosystem Advocates (WA)  
Connecticut River Watershed Council  
Concerned Citizens of Russell (MA)  
Concerned Citizens of Crawford County (IL)  
Greenwich Citizens Committee, Inc. (NY)  
Deer Creek Valley Natural Resources Conservation Association (OR)  
Dogwood Alliance  
EcoLaw/Massachusetts  
Ecology Party of Florida  
Energy Justice Network  
Environmental Alliance of North Florida  
Finger Lakes Zero Waste Coalition (NY)  
Florida League of Conservation Voters  
Floridians Against Incinerators in Disguise  
Food First/Institute for Food and Development Policy  
Forest Ethics  
Friends of Freetown/Fall River State Forest (MA)  
Friends of Middlesex Fells Reservation (MA)  
Global Alliance Against Incinerators  
Green Berkshires, Inc.  
Green Delaware  
Green Party of Florida  
Greenenvironment, LLC (MA)  
HealthLink (MA)  
HOPE (Help Our Polluted Environment) in Taylor County, Florida  
Green Press Initiative  
Indiana Forest Alliance  
Institute for Local Self Reliance (Washington, D.C.)  
Jones River Watershed Association (MA)  
Jones River Landing (MA)  
Kentucky Heartwood  
Leaders for Today (MA)  
Massachusetts Environmental Energy Alliance  
Massachusetts Forest Watch  
Nassau County Group of the Sierra Club (FL)  
Native Forest Council  
Neighbors Against the Burner (MN)  
Oregon Toxics Alliance

Pioneer Valley Preservation Coalition (MA)  
Pike Gibson Citizens for Quality Environment (IN)  
RESTORE: The North Woods  
Salem Alliance for Environment (MA)  
Springfield Area Sustainable Energy Association (MA)  
Stand Up/Save Lives Campaign (IL)  
Trout Unlimited/Greater Boston (MA) Chapter  
ValleyFree Radio (MA)  
The Wilderness Society/Australia, Forests and Climate Change Campaign  
World Species List Forest (MA)

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