

**Clean Air Task Force * Conservation Law Foundation * Defenders of Wildlife
Earth Day Network * Environment America * Environmental Defense Fund
Environmental Working Group * Friends of the Earth * Greenpeace
League of Conservation Voters * National Audubon Society
National Center for Conservation Science and Policy * National Wildlife Federation
Natural Resources Defense Council * Safe Climate Campaign * Sierra Club
Southern Environmental Law Center * The Wilderness Society
Union of Concerned Scientists * World Wildlife Fund**

Dear Senator,

On behalf of the undersigned organizations and our millions of members, we write to express serious objections to the biofuels components of “Securing America’s Future with Energy and Sustainable Technologies Act” (SAFEST). We appreciate Senators Klobuchar and Johnson’s inclusion of a strong Renewable Energy Standard and Energy Efficiency Standard and recognize the Senators’ objective to help move the nation toward a clean energy future by seeking to involve agriculture and forestry in addressing global warming. Unfortunately, the biofuels provisions of this proposal would actually have the opposite effect – leading to increased greenhouse gas emissions from agriculture and forestry, while also wasting taxpayer money and degrading natural ecosystems and the environment. Therefore, with these provisions included, we would have to strongly oppose the legislation as written.

Biomass, used correctly, can be a part of the solution to the climate crisis and contribute to energy security. But, the science shows that if done wrong, biomass can harm biodiversity, adversely impact human health, and increase greenhouse gas emissions thereby undermining our climate goals. Net climate impacts can vary greatly depending on a number of different factors, which makes accounting for biomass emissions essential. Accurate accounting principles are a necessary component of biomass development. SAFEST would undercut accurate accounting by eliminating international indirect land use change emissions in calculating the life cycle emissions of biofuels. All scientific evidence indicates that these emissions are significant and ignoring them would result in a skewed calculation of the overall carbon footprint of biofuels. Similarly, making corn ethanol eligible as an advanced biofuel for purposes of the Renewable Fuels Standard (RFS) would undermine the development of greener, more efficient second generation technology biofuels whose life cycle carbon emissions are lower than that of corn ethanol. Equally, exempting biodiesel from the greenhouse gas standards would likewise undermine the goal of the RFS.

SAFEST would also reauthorize the Volumetric Ethanol Excise Tax Credit (VEETC) for five years at the current rate of \$.45 per gallon to oil companies for each gallon of ethanol they blend into gasoline. Since oil companies are already mandated under the Renewable Fuels Standard to blend ethanol, this funding is duplicative and wasteful. Further a recent CBO report indicated that the cost of ethanol amounts to a de facto gas tax that costs consumers \$1.78 per gallon. Moreover, a recent University of Iowa study, “Mandates, Tax Credits, and Tariffs: Does the U.S. Biofuels Industry Need Them All?” by Bruce A. Babcock found that “with the mandates in place, the tax credits will have no impact on industry profits or production levels...” At an

estimated \$6 billion annual cost to taxpayers, the VEETC is wasteful and no longer needed to support ethanol production. It should be allowed to expire this year.

Finally, SAFEST includes a definition of “renewable biomass” for purposes of the Renewable Electricity and Fuels Standards that includes no restrictions on biomass collected from private lands and inadequate protection for our federal forests. While many private lands can provide some biomass on a sustainable basis without degrading habitat, this definition would allow the harvest of biomass without any safeguards to ensure that natural resources and rare or threatened ecosystems are protected – even allowing for large scale clearing of native forests and grasslands in order to plant monocultures of biomass crops. This could lead to an enormous loss of wildlife and biodiversity, as well as enormous releases of carbon stored in these systems. In contrast, the Energy Independence and Security Act of 2007 (EISA), American Clean Energy Leadership Act (ACELA, S. 1462), and the Clean Energy Jobs and American Power Act (CEJAPA, S. 1733) all included protections on private and federal lands. An appropriate, more balanced definition of renewable biomass would ensure that harvesting is sustainable into the future and does not have serious consequences for biodiversity and natural ecosystems.

Pursued responsibly, bioenergy can help address global warming and contribute to energy independence while protecting natural ecosystems and the environment. Unfortunately, SAFEST as written does not help achieve this goal. Again, we appreciate the desire to advance the development of clean energy and we stand ready to work with you to ensure that the agriculture and forestry sectors can help to address global warming and our energy needs.

Sincerely,

Clean Air Task Force
Conservation Law Foundation
Defenders of Wildlife
Earth Day Network
Environment America
Environmental Defense Fund
Environmental Working Group
Friends of the Earth
Greenpeace
League of Conservation Voters
National Audubon Society
National Center for Conservation Science and Policy
National Wildlife Federation
Natural Resources Defense Council
Safe Climate Campaign
Sierra Club
Southern Environmental Law Center
The Wilderness Society
Union of Concerned Scientists
World Wildlife Fund