

**Audubon • Chesapeake Climate Action Network • Clean Water Action
Conservation Law Foundation • Defenders of Wildlife • Earth Day Network
Ecology Center • Environment America • Environment Northeast
Friends of the Earth • Greenpeace USA • League of Conservation Voters
National Wildlife Federation • Natural Resources Defense Council
Physicians for Social Responsibility • Safe Climate Campaign • Sierra Club
Southern Environmental Law Center • The Wilderness Society
Union of Concerned Scientists**

July 2, 2010

Dear Senator:

The undersigned organizations, on behalf of the millions of members we represent, are writing to let you know of our support of the U.S. Environmental Protection Agency's decision not to give a blanket exclusion to biomass when applying the Clean Air Act through the so called Tailoring Rule. In doing so, the EPA is adhering to the best available science. Biomass, done correctly, can be a part of the solution to the climate crisis. But, if done wrong, biomass can increase greenhouse gas emissions and undermine our climate goals. Net climate impacts can vary greatly depending on a number of different factors, which makes accounting for biomass emissions complex. Accurate accounting principles are a necessary component of biomass development.

By including biomass under the Tailoring Rule, the EPA acknowledges the wide variety of emissions outcomes from biomass and also follows the congressional directive to carefully evaluate the consequences of its decisions. It is for these reasons why we ask you not to sign the Dear Colleague currently being circulated by Senators Lincoln and Chambliss that argues for a blanket assumption of "carbon neutrality" for biomass.

Recent studies strongly indicate that blanket assumptions regarding biomass emissions are inappropriate. Biomass consumption is not always "carbon neutral", nor is it always "worse than coal." In order to ensure that biomass remains a positive addition to our country's economic future and clean energy policy, regulatory and financial incentive programs must accommodate and distinguish a range of possible outcomes depending on the source of the biomass, its transportation and its conversion to useable energy.

Successful reduction of greenhouse gases will require accurate and full accounting of our emissions sources, which must also include the fuels we turn to as part of the solution. A recent Manomet Center for Conservation Sciences report on biomass sustainability shows that in Massachusetts, net carbon emissions profiles varied widely depending on what type of energy is being replaced and the source of biomass -- whether the source was from waste wood or logging residue, or from the whole tree. The range of results was so great as to underscore both that not all biomass can be assumed to be carbon neutral, and that accurate accounting principles are necessary if biomass emission reduction goals are to be realized.

In the Tailoring Rule, EPA includes the smokestack pollution from burning biomass and commits to issuing guidance on how to account for the complexity of biomass's potential to reabsorb some or all of this pollution as plants grow back, an approach which finds support in existing congressional precedent. When amending the Renewable Fuels Standard in the 2007 energy bill, Congress rightly determined that ethanol and other biomass-based fuels can have a wide range of emissions impacts and required that EPA regulate biofuels via a lifecycle emissions analysis.

Additionally, the EPA has not, in fact, declared that it will treat "biomass combustion the same as fossil fuels" as many have claimed. The EPA has yet to determine what the permitting requirements will be for each source of fuel. EPA has the option of allowing biomass users to meet their emissions limits through use of documented low-emissions sources for example, whereas fossil fuel emissions regulation is likely to focus on specified combustion technologies.

In this rulemaking, the EPA is simply following the science. In addition to the Manomet study referenced above, several studies, such as Searchinger et al (*Science* Vol. 326, October 2009), have pointed out the critical need for accurate accounting. And last month, 90 prominent scientists sent a letter to Speaker Pelosi and Majority Leader Reid to voice their concerns on this issue, highlighting that how biomass is sourced could create a significant carbon debt and advocating for accurate accounting in any climate or energy legislation put forward by Congress.

We strongly support including biomass facilities under the tailoring rule and applaud the EPA's efforts to ensure that a strong scientific basis exists for all of the Agency's climate regulations. By following the science we can work towards the goal of developing solutions instead of further contributing to greenhouse gas emissions.

Sincerely,

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Attachments:
90scientistsletter.pdf