

**Audubon * Center for Biological Diversity * Clean Air Task Force
Clean Water Action * Conservation International
Conservation Law Foundation * Defenders of Wildlife
Ecology Center * Environmental Defense Fund * Environmental Working Group
Friends of the Earth * Greenpeace * Natural Resources Defense Council
Public Citizen * Sierra Club * Southern Alliance for Clean Energy
Southern Environmental Law Center * Union of Concerned Scientists
The Wilderness Society * World Wildlife Fund**

May 28, 2010

Dear Senator,

On behalf of our millions of members, activists, and supporters we urge you to oppose Senators Baucus, Tester, and Crapo's Bill, S. 3381, to amend and unify the definition of biomass for the Renewable Fuels Standard and any future bioenergy policies. This bill would roll back critical environmental safeguards that help ensure that biomass resources are produced and harvested in ways that protect important wildlife habitat, at risk forests and grasslands, and our federal forests.

Some types of bioenergy, such as sustainably sourced agricultural, forestry, and urban restudies, as well as some dedicated energy crops grown on marginal lands, may not only create jobs in rural communities, but also cut carbon pollution and produce other ecological benefits while reducing our dependence on imported oil. Without adequate protections, however, bioenergy runs the risk of no longer acting as an important tool to reduce carbon emissions, but instead as a source of additional carbon pollution and increased threats to important natural resources. Deforestation already contributes 15 percent of global greenhouse gas emissions and our bioenergy policies must assiduously avoid contributing to this problem. Furthermore, unfettered bioenergy sourcing could also harm sensitive lands and wildlife habitat.

S.3381 would eliminate meaningful safeguards for ecosystems in bioenergy policy that were enacted in the Energy Independence and Security Act of 2007, a bill that passed with broad bipartisan support. In place of the definition included in that bill, S.3381 would substitute the definition for biomass created in the 2008 farm bill. The farm bill definition does not include sustainability safeguards because it was written to apply to programs authorized in the farm bill that contained separate provisions to ensure the sustainability of biomass production and harvest. Requiring the use of the farm bill definition for purposes of the RFS and future bioenergy policy thus not only eliminates the safeguards Congress agreed to as part of the 2007 energy bill but also separates this definition from the sustainability criteria Congress intended to go with it when it overwhelmingly passed the 2008 farm bill months later.

Without a strong definition of qualifying biomass sources, there is a significant risk that natural resources and wildlife will be adversely impacted by the combined demand from the current Renewable Fuels Standard, a Renewable Electricity Standard, and a limit on carbon emissions that incentivizes the use of biomass. We strongly oppose the use of definitions that fail to include any sourcing safeguards for private lands or adequate protections on federal lands.

As climate change radically alters our landscape, we must preserve our remaining natural ecosystems and ensure they are healthy and resilient. S.3381 would remove vital ecosystem protections in bioenergy policy, replacing the current definition of renewable biomass with a version that lacks, by itself, any meaningful protections. We ask that you oppose S.3381.

Sincerely,

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CC: United States Senate