

350.Org * ActionAid USA * Airheads (Minnesota) * Alabama Center for Rural Enterprise * Alliance for the Wild Rockies Arise for Social Justice * Athens County Fracking Action Network. * Battle Creek Alliance Beyond Toxics Biofuelwatch * Buckeye Forest Council, Inc. * California Communities Against Toxics * Center for Biological Diversity * Center for International Environmental Law * Center for Sustainable Economy Chlorine Free Products Association * Clean Air Council * Coalition Against the Rockaway Pipeline Community Research of College Park Maryland * Conservatree * Dogwood Alliance * Don't Waste Arizona Ebbetts Pass Forest Watch * EcoLaw Massachusetts * Energy Justice Network * Enviro-Show Environmental Health Studies Project * Environmental Justice Center of Chestnut Hill United Church Epic-Environmental Protection Information Center * Family Farm Defenders Florida Environmental Justice Network * Florida League of Conservation Voters * Food & Water Watch Friends of Bell Smith Springs * Friends of the Earth * Global Alliance for Incinerator Alternatives Global Justice Ecology Project * Greater Southeast Alaska Conservation Community Green America Green Delaware * Greenpeace USA * Heartwood * Indigenous Environmental Network John Muir Project of Earth Island Institute * Kentucky Environmental Foundation * Kentucky Heartwood Klamath Forest Alliance * KyotoUSA * League of Wilderness Defenders Neighbors Against the Burners (Minnesota) * New York Climate Action Group Nuclear Information and Resource Service * Olympic Forest Coalition * Organic Consumers Association Partnership for Policy Integrity * Physicians for Social Responsibility * Rachel Carson Council Rainforest Action Network * RESTORE: The North Woods * San Juan Citizens Alliance Save Our Sky Blue Waters * Sound Resource Management Group * Southern Oregon Climate Action Now Springfield Climate Justice Coalition * Stand * Sustainable Energy & Economy Network * Swan View Coalition Texas Campaign for the Environment * The California Chaparral Institute * Toxics Action Center Campaigns Western Nebraska Resources Council * Wild Nature Institute * Wild Virginia * WildEarth Guardians Wilderness Watch * WildWest Institute * Wiregrass Activists for Clean Energy * Yellowstone to Uintas Connection

April 19, 2016

Dear Chairwoman Murkowski and Ranking Member Cantwell:

On behalf of our members and activists and staff scientists, and the community members with whom we work, we are writing to voice our opposition to the Energy Policy and Modernization Act, S. 2012, because of its treatment of bioenergy. The amendment from Senators Collins and Klobuchar would undermine the ability of EPA to set policies that reduce greenhouse gas emissions. This amendment sets a dangerous precedent for all climate science and could potentially lead to accelerated forest clearing for biomass fuel. An amendment from Senator Manchin promoting bioenergy as “net carbon negative” is similarly problematic. We therefore oppose any legislation that includes either the Collins-Klobuchar biomass definitions or the Manchin Carbon Capture and Sequestration proposal.

Biomass Definition

The Senate accepted a Collins-Klobuchar amendment (S. Amnd. 3140) instructing the Secretaries of Energy and Agriculture and the Environmental Protection Agency (EPA) to develop policies that “reflect the carbon neutrality” of forest-derived biomass. However, treating forest bioenergy as having no carbon emissions directly contradicts physical reality. Per megawatt hour, biomass facilities emit more carbon dioxide than fossil fuel plants, due to their low efficiency and the inherent low energy density of wood as a fuel.¹ There is broad scientific

¹ <http://www.pfpi.net/carbon-emissions>, <http://www.pfpi.net/air-pollution-2>

consensus that biomass is not categorically carbon neutral, given its immediate emissions and the long timeframes required to offset emissions with new forest or plant growth.² Additionally, bioenergy is not as competitively priced as wind, hydroelectric, or other, cleaner technologies.³

Legislating the carbon neutrality of an emissions-producing technology sets a dangerous precedent for all climate science, in that it attempts to override physical facts with policy declarations. The language also sets a dangerous precedent in seeming to give other agencies the authority to effectively veto EPA determinations on matters within its jurisdiction.

Carbon Capture and Sequestration

We are also concerned by an amendment slated for a vote from Senator Manchin, S. Amnd. 3270. The amendment promotes co-firing biomass with coal as a way to create “*net-negative carbon emissions*,” when in actuality, co-firing of biomass will increase emissions of carbon dioxide.⁴ The amendment also promotes biomass in combination with carbon capture and sequestration, an unfeasible and un-scalable approach that would yield no meaningful reductions in greenhouse gases while costing billions in taxpayer dollars.

Scientists, activists, and politicians around the world agree that we need to reduce our emissions as soon as possible to prevent catastrophic warming of our planet.⁵ Legislating science, in contravention of physical reality, is a mistake that will do nothing to stop the actual accumulation of carbon dioxide in the atmosphere. We oppose S.2012 if it includes either the Collins-Klobuchar “carbon neutrality” amendment or the Manchin Carbon Capture and Sequestration proposal.

Sincerely,

350.ORG

ActionAid USA

Airheads (Minnesota)

Alabama Center for Rural Enterprise

Alliance for the Wild Rockies

Arise for Social Justice

Athens County Fracking Action Network.

Battle Creek Alliance

Beyond Toxics

Biofuelwatch

² <<http://www.pfpi.net/wp-content/uploads/2015/11/PFPI-bioenergy-and-the-CPP-Nov-45-2015.pdf>>

³ <https://www.eia.gov/todayinenergy/detail.cfm?id=21492>

⁴ <http://www.pfpi.net/wp-content/uploads/2015/11/PFPI-bioenergy-and-the-CPP-Nov-45-2015.pdf>

⁵ <https://www.washingtonpost.com/news/energy-environment/wp/2016/02/26/these-scientists-say-congress-is-legislating-scientific-facts-and-wrong-ones-too/>

Buckeye Forest Council, Inc.
California Communities Against Toxics
Center for Biological Diversity
Center for International Environmental Law
Center for Sustainable Economy
Chlorine Free Products Association
Clean Air Council
Coalition Against the Rockaway Pipeline
Community Research of College Park Maryland
Conservatree
Dogwood Alliance
Don't Waste Arizona
Ebbetts Pass Forest Watch
EcoLaw Massachusetts
Energy Justice Network
Enviro-Show
Environmental Health Studies Project
Environmental Justice Center of Chestnut Hill United Church
Epic-Environmental Protection Information Center
Family Farm Defenders
Florida Environmental Justice Network
Florida League of Conservation Voters
Food & Water Watch
Friends of Bell Smith Springs
Friends of the Earth
Global Alliance for Incinerator Alternatives
Global Justice Ecology Project
Greater Southeast Alaska Conservation Community
Green America
Green Delaware
Greenpeace USA
Heartwood
Indigenous Environmental Network
John Muir Project of Earth Island Institute
Kentucky Environmental Foundation
Kentucky Heartwood
Klamath Forest Alliance
KyotoUSA
League of Wilderness Defenders
Neighbors Against the Burners (Minnesota)

New York Climate Action Group
Nuclear Information and Resource Service
Olympic Forest Coalition
Organic Consumers Association
Partnership for Policy Integrity
Physicians for Social Responsibility
Rachel Carson Council
Rainforest Action Network
RESTORE: The North Woods
San Juan Citizens Alliance
Save Our Sky Blue Waters
Sound Resource Management Group
Southern Oregon Climate Action Now
Springfield Climate Justice Coalition
Stand
Sustainable Energy & Economy Network
Swan View Coalition
Texas Campaign for the Environment
The California Chaparral Institute
Toxics Action Center Campaigns
Western Nebraska Resources Council
Wild Nature Institute
Wild Virginia
WildEarth Guardians
Wilderness Watch
WildWest Institute
Wiregrass Activists for Clean Energy
Yellowstone to Uintas Connection