

## Anti-Biomass Incineration and Forest Protection Campaign

July 29, 2010

President Obama  
The White House

Senator Harry Reid  
Majority Leader  
United States Senate

Representative Nancy Pelosi  
Speaker of the House  
United States House of Representatives

Re: Request to Exclude Dirty Biomass Incinerators from Renewable  
Electricity Standard (RES), Farm, and Energy Bills

Dear President Obama, Majority Leader Reid, and Speaker Pelosi,

We write to express our deep concern about the inclusion of dirty biomass and garbage burning incinerators in the Renewable Electricity Standard (RES) of proposed energy legislation. We are also concerned about industry efforts to expand the definition of “biomass” in the Farm Bill and Energy Independence and Security Acts.<sup>i</sup> We similarly oppose industry efforts to avoid EPA regulation under the Clean Air Act greenhouse gas “Tailoring Rule” and proposed rules to reduce hazardous air pollution emissions.<sup>ii</sup>

Currently, the United States already gets 50% of its so-called “renewable energy” (electricity) from dirty biomass incinerators that make people sick, emit toxic chemicals into our air, dry up and pollute our rivers, and cause our forests to be cut down. Instead of promoting more tree and garbage burning incinerators in the RES and other proposed legislation, we urge Congress to direct our taxpayer and ratepayer funds to truly clean and green energy – solar, wind, and ocean energy – not polluting incinerators. Incinerators are a step backward for our country, not the way to a renewable “clean and green” future.

The evidence is clear, from industry reports and permits, that so called “renewable energy” biomass and garbage incinerators emit a lethal mix of toxic chemicals to our air and water – this includes deadly particulates, such as PM 2.5 and nanoparticulates, mercury, lead, dioxins and greenhouse gases. Leading medical organizations including the American Lung Association, Massachusetts Medical Society, North Carolina Academy of Family Physicians, the Florida Medical

Association and Physicians for Social Responsibility oppose incentives for biomass incinerators because they present an “unacceptable health risk”.<sup>iii</sup> An RES or other legislation to further subsidize these incinerators will lock in new and continuing sources of smokestack emissions for the next thirty years.

Burning biomass is not “carbon neutral” in any timeframe that is meaningful to climate change. Our nation’s forests are natural “carbon sinks” and our best defense against the climate crisis. When forests are cut for biomass incinerators, they will not re-sequester the amount of carbon released for decades or centuries, if at all. Groundbreaking scientific reports issued in June 2010 by the Manomet Center for Conservation Science and Environmental Working Group<sup>iv</sup> conclusively show that biomass incineration using forests as fuel will undermine efforts to curb carbon emissions. The destructive impacts on forest biological diversity have been documented from Oregon to Massachusetts. Burning garbage and wood for electricity is terribly inefficient; biomass incinerators are about 25% efficient – that is, for every 100 trees burned, only 25 are converted into energy. Finally, available data shows biomass burning smokestacks emit more carbon dioxide per unit of energy than coal, oil and natural gas, and in some cases up to 50% more carbon dioxide than coal, per unit of energy.<sup>v</sup>

In the face of the new science showing that cutting down forests and burning them in biomass incinerators makes climate change worse, on July 7, 2010 Massachusetts Secretary of Energy and Environmental Affairs announced that the state’s Department of Energy Resources will proceed with regulations to exclude commercial electricity-only biomass incinerators from the state renewable portfolio standard.<sup>vi</sup> This directive followed years of citizen opposition to so called “clean and green” biomass incinerator proposals, culminating with a ballot question to eliminate ratepayer subsidies. Americans understand that biomass and garbage incinerators have destructive impacts on their health, their communities and the environment, and new incinerator proposals are increasingly viewed as politically infeasible in cities and towns across the country.<sup>vii</sup> Similarly, national legislative and regulatory efforts to promote biomass incinerators are neither legally nor scientifically defensible. The Massachusetts decision is an important bellwether for Congress, both politically and scientifically.

Incinerators are a poor job creation vehicle and do little to support rural economies. First, we must weigh industry speculation about potential job benefits against the certainty that toxic air emissions from incinerators drive up health care costs by causing diseases such as asthma, COPD, heart disease, cancer, and premature death. Second, industry documents show that the typical 50 megawatt biomass electricity incinerator creates only twenty permanent jobs. Third, these few jobs come at a tremendous cost to the American taxpayer: the typical biomass incinerator is eligible for a cash grant of one third of its capital costs in the form of an American

Reinvestment and Recovery Act – that’s 3.5 million dollars spent for each of the twenty permanent jobs. These taxpayer funds can be used in a more fiscally responsible manner to create far more than twenty jobs. Fourth, the sweeping, unsubstantiated industry assertions about “job creation” wholly ignore the societal costs to local communities burdened with incinerators: including the noise impacts from a 24/7/365 operation with at least two hundred daily diesel truck trips, and pollution of our air, water and destruction of our forests.

With its massive taxpayer and ratepayer subsidies, biomass and garbage burning for electricity is a highly lucrative industry. ARRA cash grants are being given to international joint ventures such as Iberdrola and ADAGE. Very little of the public funds spent on incinerators actually goes to American workers. The global incinerator industry does not need our “clean energy” subsidies. This is a profoundly poor use of taxpayer money and is contrary to the interests of the American people.

Finally, incinerators are not the answer to “energy independence” as industry argues. Climate change has national security impacts and subsidizing incinerators that make climate change worse *undermines* national security. Nor does the biomass industry acknowledge that biomass incinerators are heavily dependent on foreign oil to operate the heavy equipment used to extract wood from forests, chip trees, and operate diesel trucks to get the biomass to the incinerators. In addition, tree plantations and biomass crop production relies on imported fossil fuel energy in the form of nitrogen fertilizer,<sup>viii</sup> undermining claims that biomass burning increases energy independence.

As EPA Administrator Lisa Jackson said earlier this year,

“There is no denying our responsibility to protect the planet for our children and grandchildren. It's long past time we unleashed our American ingenuity and started building the efficient, prosperous clean energy economy of the future.”<sup>ix</sup>

America cannot achieve this goal by building more tree and garbage incinerators. We urge you to put the health, economic and environmental interests of American citizens first and to exclude biomass and garbage burning incinerators from any RES and limit further expansion under other federal legislation.

Arise for Social Justice (MA)  
Biofuelwatch  
Blue Ridge Environmental Defense Fund  
Buckeye Forest Council (OH)  
Cascadia’s Ecosystem Advocates (OR)  
Center for Sustainable Living (IN)

Center for Biological Diversity  
Citizens' Alliance for Clean Healthy Economy (NC)  
Coalition Against Chemical Trespass (FL)  
Concerned Citizens of Crawford County (IN)  
Concerned Citizens of Orange County (IN)  
Concerned Citizens of Florida (FL)  
Concerned Citizens of Franklin County (MA)  
Concerned Citizens of Gadsden County, Inc. (FL)  
Concerned Citizens of Russell (MA)  
Concerned Citizens of Scott County (IN)  
Dogwood Alliance  
Earth Circle Conservation and Recycling (MA)  
Energy Justice Network  
Environmental Alliance of North Florida  
Floridians Against Incinerators in Disguise  
Florida League of Conservation Voters  
Friends of the Fenholloway River (FL)  
Friends of Robinson State Park (MA)  
Friends of the Earth  
Global Exchange  
Global Justice Ecology Project  
Green Berkshires, Inc.  
Green Delaware  
Green Press Initiative  
Gulf Oil Spill Remediation Conference (International Citizens' Initiative)  
HOPE (Help Our Polluted Environment) in Taylor County, FL  
Healthcare Professionals for Clean Environment (FL)  
Heartwood  
Institute for Local Self Reliance  
Massachusetts Forest and Park Friends Network  
Massachusetts Forest Watch  
Native Forest Council  
No Biomass Burn (WA)  
Person County People Rising in Defense of Ecology (NC)  
Protect Biodiversity in Public Forests  
Real Majority Project of the Hudson Valley (NY)  
RESTORE: The North Woods (ME)  
Save America's Forests  
Sequoia ForestKeeper  
Saving Our Air Resource (MI)  
Sound Resource Management  
Southwest Ohio Green PAC  
Stop Spewing Carbon Campaign (MA)

Stop Toxic Incineration in Springfield (MA)  
Sustain Charlotte (NC)  
Sustainable Energy & Economy Network, Institute for Policy Studies  
The Biomass Accountability Project  
Texas Campaign for the Environment  
World Temperate Rainforest Network

Cc:

Secretary of Agriculture Thomas Vilsack  
Secretary of Energy Steven Chu  
Secretary of Treasury Timothy Geithner  
Lisa Jackson, Administrator, U.S. EPA

Senator John Kerry, Chair, Senate Committee on Foreign Relations  
Senator Joseph Lieberman, Chair, Homeland Security and Governmental Affairs  
Senator Jeff Bingaman, Chair, Energy and Natural Resources Committee  
Senator Amy Klobuchar, Committee on Agriculture, Nutrition and Forestry and  
Energy and Natural Resources Committee, Subcommittee on Children's Health

Representative Henry Waxman, Chair, Energy and Commerce Committee  
Representative Edward Markey, Chair, Select Committee on Energy Independence  
and Global Warming

Members of the U.S. Senate  
Members of the U.S. House of Representatives

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<sup>i</sup> Our position on the RES differs from that of the coalition of business leaders and environmental groups including Audubon, Environmental Defense Fund, and the Natural Resources Defense Council that wrote Senator Reid on July 15, 2010 urging a 25% RES by 2025. That coalition failed to seek an exclusion of biomass incinerators from the RES, and instead seeks only vague provisions for "sustainable biomass sourcing." Such biomass "protections" will not protect the public health and the environment.

<sup>ii</sup> The ACELA RES and the Securing America's Future with Energy and Sustainable Technologies Act (SAFEST), qualify burning forests and garbage as "renewable" and so-called "clean and green" electricity. In hearings before the Senate Committee on Agriculture, Nutrition and Forestry on July 21, 2010, industry representatives urged the committee to provide further preferential treatment for biomass incinerators under a panoply of legislative initiatives and regulatory programs.

<sup>iii</sup> <http://www.stopspewingcarbon.com/images/content/newsletter/BiomassBusters-July2010.pdf?ml=4&mlt=system&tmpl=component>;  
<http://www.massmed.org/AM/Template.cfm?Section=Search8&template=/CM/HTMLDisplay.cfm&ContentID=33653>

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iv “Biomass Sustainability and Carbon Policy Study,” Manomet Center for Conservation Sciences, June 2010; “Clearcut Disaster: Carbon Loophole Threatens U.S. Forests,” Environmental Working Group, June 2010.

v [http://nobiomassburning.org/docs/Plant\\_Data\\_Chart\\_2.pdf](http://nobiomassburning.org/docs/Plant_Data_Chart_2.pdf); [www.maforests.org](http://www.maforests.org);  
[www.massenvironmentalenergy.org](http://www.massenvironmentalenergy.org)

vi [www.stospewingcarbon.org](http://www.stospewingcarbon.org)

vii Biomass incinerators also face fierce opposition in Indiana, [www.scottsburgbiomass.info](http://www.scottsburgbiomass.info), Florida, [www.floridiansagainstinincineratorsindisguise.com](http://www.floridiansagainstinincineratorsindisguise.com), Ohio, Washington, Oregon, and Michigan, for example.

viii Between 1991 and 2008, U.S. nitrogen fertilizer imports tripled from 14% to 42%. See <http://minerals.usgs.gov/minerals/pubs/commodity/nitrogen/mcs-2010-nitro.pdf> and <http://minerals.usgs.gov/minerals/pubs/commodity/nitrogen/>

ix <http://www.nytimes.com/gwire/2010/05/13/13greenwire-epa-issues-final-tailoring-rule-for-greenhouse-32021.html>