



SAVE AMERICA'S FORESTS

4 Library Court, SE
Washington, DC 20003
202-544-9219
www.SaveAmericasForests.org



biofuelwatch

April 5, 2011

Statement of Carl Ross, Director, Save America's Forests, DC
Cheryl Johncox, Executive Director, Buckeye Forest Council, OH
Rachel Smolker, Ph.D., Co-Director, Biofuelwatch, VT

EPA Decision to Exempt CO₂ Biomass Emissions from Clean Air Act Regulations for Three Years

The EPA decision to give a three year exemption to CO₂ emissions from combustion of trees and other biomass lacks legal or scientific merit, endangers public health, and is fiscally irresponsible. It gives a “green” light to massive amounts of accelerated CO₂ pollution which will increase global warming.

The EPA exemption on CO₂ pollution from biomass facilities could allow up to one hundred or more of these wood biomass incinerators to be constructed over the next three years¹. A number of studies have established that, per unit of electricity generated, considerably *more* CO₂ is released from biomass combustion than from coal combustion, with any carbon re-sequestration unlikely to occur for decades. This was brought to public attention by a peer reviewed paper published in Science entitled “Fixing A Critical Climate Accounting Error”.²

80% of the world's forests have been eliminated or degraded by humans over the past 8000 years³, creating a catastrophic planetary forest deficit, which is causing world-wide biodiversity loss and adding to global warming. In the strange world where corporate pressure meets government policy and where fiction substitutes for reality, the government is turning a blind eye to the known science that logging millions, perhaps tens of millions of additional acres of U.S. forests and burning the trees in giant electricity-generating incinerators is not carbon neutral. One of the most important actions humans can take to reduce global warming is to allow more natural forests to grow on Earth, not to increase logging.

When the EPA three years from now finds what science has already explained, that logging forests and burning them for electricity is not carbon neutral, the newly constructed and operating wood incinerators will likely be “grandfathered in”, polluting the atmosphere for twenty or thirty more years. This will cause significant increases in diseases from air pollutants emitted by these tree-burning biomass facilities⁴, and also will cause significant forest degradation throughout the United States.

If the taxpayers are going to support an energy policy, it should be for efficiency, conservation, and non-polluting energy sources such as solar and wind, not construction of wood biomass dirty-energy incinerators and increased logging of forests.

We ask the EPA to uphold its job to protect the American people, adhere to science, and follow the precautionary principle by initiating a moratorium on construction of new tree burning biomass facilities until its studies are complete.

¹ Booth, Wiles, 2010: Clearcut Disaster: Carbon Loophole Threatens U.S. Forests, EWG

² Searchinger et al 2009: Fixing A Critical Climate Accounting Error, Science vol 326

³ Bryant, et al 1997: The Last Frontier Forests, World Resources Institute

⁴ Massachusetts Medical Society: Testimony in Support of House No 4458, February 25, 2010