



August 19, 2016

President Barack Obama
The White House
1600 Pennsylvania Ave., NW
Washington, DC 20500

Dear Mr. President:

On behalf of our organization that promotes science-based energy policy, we applaud the administration's public opposition to the "biomass loophole" that would enable utilities to burn wood for electricity while ignoring its carbon pollution.

We greatly appreciated the July 11th Statement of Administration Policy (SAP) that "strongly" objected to the biomass provision in the House Interior, Environment and Related Agencies Appropriations Act, H.R. 5538. This measure would require the Environmental Protection Agency (EPA) to define forest biomass energy as carbon neutral, which would ignore the pollution from burning wood for electricity. The provision, as the SAP noted, "would compel EPA to disregard the scientific recommendations of its own Science Advisory Board and other technical studies." We also welcome the administration's opposition to similar language in the Senate Interior and Environment Appropriations bill.

We urge the administration to promptly reiterate its public opposition to these provisions and any other similar proposal. Most immediately, this includes opposition to the biomass loophole in the North American Energy Security and Infrastructure Act, S. 2012, pending in a Senate-House conference committee. This bill would define wood burning for electricity as carbon neutral and ignore the carbon pollution from this practice. This provision could significantly weaken our ability to reduce greenhouse gas emissions, undermine the effectiveness of the Clean Power Plan, and compromise our commitment to help prevent global temperature increases under the COP 21 Paris Agreement of 2015.

Burning wood inefficiently generates electric power. Therefore, it produces carbon dioxide emissions that are typically 150 percent *greater* per unit of electricity than those from a coal burning power plant. Wood combustion produces up to 400 percent more pollution compared to a natural gas burning power plant. Theoretically, replacement of the mature trees burned for electricity with saplings can eventually offset the carbon dioxide pollution created by the wood combustion. However, studies determined that such offsets take a long time to occur because it takes decades of sapling growth to sequester the same amount of carbon as a mature tree.

Burning wood for electricity also reduces the ability of a forest to act as a "carbon sink" to sequester and store carbon dioxide from the atmosphere. From the atmosphere's point of view, decreasing a carbon sink has the same effect as increasing pollution from another source. Both

boost carbon levels in the atmosphere. Burning trees for electricity, therefore, harms the climate in two ways. Burning wood increases emissions compared to using fossil fuels while decreasing the capture of carbon pollution from the atmosphere.

Our organization, the Partnership for Policy Integrity, is based in Massachusetts and uses science, legal action, and strategic communication to promote science-based energy policy. We were involved in the debate over proposed new bioenergy plants there. Before Gov. Deval Patrick considered approval of the proposed facilities, the Massachusetts government commissioned a study of bioenergy's impacts. The 2010 analysis found that wood burning for electricity would undermine Massachusetts' ability to meet its 2020 and 2050 emission reduction targets. The state subsequently ended its renewable energy subsidies for commercial scale bioenergy plants. The U.S. Senate energy bill and the appropriations bills would prevent the EPA from making a similar science-based decision about biomass combustion.

Treating bioenergy as carbon neutral undermines the goal of reducing carbon pollution under the Clean Power Plan. This is not a guess -- the European Union (EU) already tried this approach. The EU classified bioenergy as carbon neutral while putting a price on carbon pollution. The result was a massive increase in burning wood for electricity because this practice avoids the carbon price. Wood pellets made from U.S. forests provide the majority of biomass burned in the United Kingdom. As states begin to make pollution reductions under Clean Power Plan, we could see a similar increase in wood-burning to replace coal because the Senate bill treats the former energy technology as pollution free. Instead of the biomass loophole, we need policies that increase forest acreage and lower power plant emissions to achieve the Clean Power Plan's goal.

We commend you for the multiple programs you launched to reduce the carbon pollution responsible for climate change. We applaud your opposition to Congressional efforts to define away forest bioenergy pollution by classifying it as carbon neutral. We urge the administration to promptly and visibly oppose the biomass loophole in S. 2012 during the energy bill conference. We offer our assistance and support for this effort. Thank you.

Sincerely,

Mary S. Booth, PhD
Director
Partnership for Policy Integrity