

EcoLaw Massachusetts
61 Grozier Road, Cambridge MA 02138

September 24, 2009

Submitted via email to: BCAPEIS@geo-marine.com and Matthew.Ponish@wdc.usda.gov

Re: Comments on the “Draft Programmatic Environmental Impact Statement, Biomass Crop Assistance Program, Farm Service Agency, U.S. Department of Agriculture”

Dear Sir/Madam:

These comments on the above referenced impact statement (DPEIS) are submitted on behalf of the organizations listed below.

The DPEIS is inadequate because it fails to assess the damage to the environment caused by the burning of the biomass crops to generate electricity. This includes air pollution, water pollution, the impacts of water withdrawals for power plant cooling, and the loss of carbon sequestration capacity of forests.

Moreover, carbon dioxide emissions from burning biomass crops to generate electricity escape all regulatory review and accountability. These emissions are not required to be reported to the U.S. EPA under its Clean Air Act accounting program via EPA’s E-Grid data base. Nor are these carbon dioxide emissions covered by state “cap and trade” programs. This results in a massive loophole allowing biomass burning carbon dioxide emissions to escape regulatory accountability. Carbon dioxide is the most prevalent greenhouse gas.

1. The biomass burning CO₂ emissions loophole

Natural Resources Defense Council climate scientist David Hawkins testified before the Senate Environment and Public Works Committee on July 7, 2009, that the proposed federal cap and trade bill contains “a large biomass loophole that ignores the global warming emissions related to biomass production and combustion.” This loophole allows these power plants to generate unlimited and uncontrolled amounts of CO₂. According to U.S. Department of Energy figures, by 2020 biomass burning will generate 700,000,000 million tons of CO₂ per year.¹ Classifying biomass burning as a “renewable

¹ According to the EIA, projected biomass power generation by 2020 is 70,000 MW with a 20% Renewable Portfolio standard. The typical 50 MW wood burning power plant emits 500,000 tons per year of CO₂. Roughly extrapolating, this means that under a

energy source” means that it is promoted and subsidized by the USDA and other federal agencies even though the CO₂ emissions emitted from the smokestacks of biomass burning power plants accelerates climate change.

2. The air pollution impacts of biomass burning are worse than burning coal.

The burning of biomass crops that will be harvested under the PDEIS emits 1.5 times the carbon dioxide (CO₂), 1.5 times the carbon monoxide (CO, a toxic air pollutant), and as much particulate matter as burning coal.² The latter toxic emissions cause cancer, asthma and respiratory ailments. Incineration and biomass burning to generate renewable electricity also generates toxic ash, drains rivers through the evaporation of large volumes of cooling water, often discharges heated and polluted effluent to rivers, and when wood is used, burns forests thereby decreasing the capacity of the ecosystem to sequester carbon.

3. The DPEIS ignores the role of the Federal forests that will be logged under the DPEIS as critical “carbon sinks” for their carbon sequestration value.

4. Biomass burning is not carbon neutral.

Burning woody biomass to generate “renewable electricity” adds greenhouse gases to the atmosphere in the critical near-term period. This CO₂ will not be reabsorbed before the planet reaches its “tipping point.” According to U.S. EPA, the CO₂ emitted by burning biomass and other materials to generate renewable electricity will not be reabsorbed for hundreds to thousands of years. The U.S. EPA’s April 2009 proposed endangerment finding puts the matter starkly: “... for a given amount of CO₂ released today, about half will be taken up by the oceans and terrestrial vegetation over the next 30 years, a further 30 percent...over a few centuries, and the remaining 20 percent...will take many thousands of years to remove from the atmosphere.” 74 Fed. Reg. 18899, 4/24/2009.

The large volumes of CO₂ emissions that will be emitted by burning the woody biomass harvested by programs under the DPEIS to generate so called “renewable electricity” will not be reabsorbed in time to “neutralize” this CO₂. This is true – regardless of the number of trees planted to replace the wood that is burned. There is a

20% RPS by 2020 combustion based biomass power production will emit 700,000,000 tons of CO₂ per year. See chart at:

http://www.eia.doe.gov/oiaf/analysispaper/biomass/figure_4.html

² See, www.massenvironmentalenergy.org for plant data on typical 50 MW power plants that burn wood. The Global Alliance for Incinerator Alternatives has also documented that emissions from incineration to generate renewable electricity emits more toxins than coal burning. Additional information can be obtained from Energy Justice Network, www.energyjustice.org.

difference in CO₂ absorption capacity between old forests and new growth trees. In an article entitled “The Giving Trees,” Spring 2008 edition of NRDC publication ONEARTH, the author writes: “It turns out forests hundreds of years old can continue to actively absorb carbon, holding great quantities in storage. Resprouting clear-cuts, on the other hand, often emit carbon for years, despite the rapid growth rate of young trees.”³

4. The USDA’s funding and technical support for and promotion of the incineration of woody biomass as a source of renewable energy is tantamount to perpetuating a fraud on the American people.

There is no credible scientific data to support the assertion that burning wood to generate electricity is “carbon neutral” and an antidote to the global warming crisis. The DPEIS is fundamentally flawed in its failure to address all of the impacts associated with burning wood to generate electricity.

Very truly yours,

signed

Margaret E. Sheehan, Esq.

On behalf of:

Massachusetts Forest Watch

Ellen Moyer, PhD., P.E.

RESTORE: The Northwoods

Massachusetts Environmental Energy Alliance,

EcoLaw Massachusetts, www.nobiomassburning.org

Sharl Heller, President, Friends of Myles Standish State Forest

Anne Bingham, Esq., Massachusetts

Concerned Citizens of Franklin County, Executive Committee

Contact: EcoLaw/Massachusetts, Margaret E. Sheehan, Esq., meg@ecolaw.biz, 508-259-9154

Cc: Lisa Jackson, Administrator, U.S. EPA, Washington, D.C.

Enc. Eric Johnson, “Goodbye Carbon Neutral, Getting Biomass Footprints Right”

³ <http://www.onearth.org/article/the-giving-trees?page=1>