

PO Box 2190, Eugene OR 97402

541.688.2600

541.431.2156 fax

September 24, 2009

VIA E-MAIL TO: BCAPEIS@geo-marine.com

Geo-Marine, Inc.

2713 Magruder Blvd, Suite D

Hampton, VA 23666

Re: Draft Programmatic Environmental Impact Statement for the Biomass Crop Assistance Program (DPEIS), availability announced at 74 Fed Reg 39915 (August 10, 2009).

Please accept these comments of the Native Forest Council (NFC) on the Draft Programmatic Environmental Impact Statement for the Biomass Crop Assistance Program (DPEIS) published by Farm Service Agency of the US Department of Agriculture (USDA). NRDC appreciates the substantial nature of an undertaking like this, the need to review numerous impacts over a wide geographic area in a manageable fashion, and the felt need for

promptitude. We find, however, that the DPEIS contains neither adequate comparative information on potential cumulative impacts nor a sufficient range of alternatives to allow the public, sister agencies, government officials, or ultimately the program decision maker to make a sufficiently reasoned choice. We therefore ask that the DPEIS be withdrawn and that a significantly revised version be circulated for further comment.

The action alternatives proposed by this DPEIS for the removal and burning of forest biomass are based on fraudulent claims and dishonest industry misinformation and lies. This DPEIS claims that burning forest biomass is carbon neutral and will significantly reduce greenhouse gasses. However, based on even the available industry data, forest biomass not only produces 50% more carbon dioxide than burning coal, it also produces more nitrous oxide, VOC's and particulates than coal while far less efficient.

The commonwealth's publicly-owned trees and forest biomass is destroyed in seconds to provide an inefficient and unprofitable contribution to our energy system that in no way can replace the value, let alone the "full-replacement-cost-of-goods-sold" value, of the trees and the soil, air and water impacts, forest destroyed or the nutrients robbed that were provided by the decay and decomposition of these biomass materials. All of these values have gone ignored or discounted to zero in your flawed DPEIS. If the carbon released by burning forest biomass is ever sequestered, it will be centuries, if not millennia, from now, if ever. Many times the power that burning the forests may provide could be saved far more rationally, economically and ecologically and very quickly by reducing our consumption, conservation. We cannot burn our way out of our oil addiction. We could however, easily burn our way out of an inhabitable planet.

In your discussion of the definition of sustainable you assert: "In broad terms

environmental sustainability must incorporate the following principles: future generations must have equal or better environment, economic (or as in

this study, farming) activities must not degrade the environment, ensuring that the environment is allowed to be adaptable and resilient to change, that irreversible damage and long term damage to the environment be avoided, and that practices that are sustainable at one scale are not damaging at a larger scale.”

Long term management and utility of our national forests has, ever since the 1950s, resulted in degradation and irreversible long-term damage. Which is what the 50 or 60 USFS Supervisors had to say in their Sunbird and other letters, that the Forest Service had become a rogue agency, out of control, little more than an industry lackey. Since then the Agency has gotten worse, not better. While it is possible that some small and precise projects could perhaps generate some improvement for industry on a micro scale, the overall trend has been and will continue to be a rapid downward spiral of the health, vigor, sustainability and biodiversity of our priceless and irreplaceable primeval and native national forests. They make up a part of the lungs-of-the-planet and the “nature’s services” they provide are far more vital to continued human existence than the idiotic idea of finding yet another reason for industrial liquidation and fraudulent profits. Their profits are counted, while most of the costs to the commonwealth and human survival are not. More Trojan-horse justifications or “management” under the guise of biomass power generation is certain to continue degrading the water and depleting the soils of these publicly owned lands and natural resource capital assets. Burning forest biomass for fuel is a dangerous and irrational path that must be avoided.

The only people to whom burning forest biomass for electricity or fuel might possibly make some sense is in the minds and wallets of the owners and stockholders of the faceless corporations that will be guaranteed profits from the taxpayer-subsidized removal and exploitation of the commonwealth, burning the planet for fraudulent profits using dishonest and fraudulent accounting and economics. It’s also another way predatory corporations and parasites have found to extort tax and other subsidies. Your promotion of this process makes the USFS, USDA, USDI complicit an act of war against nature, and by extension, a Crimes Against Humanity, and the people of our nation. It is truly eco-terrorism and yet another act of

corporate welfare/socialism. Do not privatize, steal and destroy the commons! Regardless of whether you call it Creation, nature or just the Earth, we can't live long without it and already too much has been lost.

Quoting Chris Matera, the founder of Massachusetts Forest Watch, "At this time of ecological and economic crisis, there can be no reasonable argument for forcing taxpayers to subsidize new polluting, CO2 emitting, forest devastating carbon-based fuels for minimal amounts of power. These policies will worsen air pollution, increase greenhouse gas emissions, deplete forests and drain our public coffers, the exact opposite of what we need to be doing right now."

Stop the madness...

Because the flaws in the DPEIS run too deep to allow for informed comment on the central issues facing USDA in this process, NEPA requires circulation of a new or revised DPEIS. We look forward to reviewing and commenting on one as soon as it becomes available. Thank you for considering our views.

/s/

Tim Hermach

Executive Director

--

Tim Hermach

Native Forest Council

PO Box 2190
Eugene, OR 97402
541.688.2600
541.461.2156 fax

web page: <http://www.forestcouncil.org>

DEFENDING NATURE, SAVING LIFE

* Honest & Fully-Costed Accounting, Education, Advocacy & Litigation, *
Real Protection for 650 Million Acres of Publicly Owned Land, Rivers &
Streams See the industry's report card
at: <http://forestcouncil.org/learn/aerial/index.html> Donate Now Online, call
or mail to the address
above <http://www.guidestar.org/partners/networkforgood/donate.jsp?ein=93-0977788>