

September 9, 2021

The President
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Mr. President,

On behalf of our millions of members, we enthusiastically stand in support of your commitment to tackle the climate crisis while centering equity and environmental justice, and we applaud the Administration for not including the legacy rider declaring biomass to be “carbon neutral” in the President’s FY 2022 Budget and for withdrawing the Trump-era proposed rule aimed at doing the same for the purpose of Clean Air Act permitting.¹

The IPCC’s recent climate report is unequivocal—we will overshoot both 1.5°C and 2°C this century unless drastic CO₂ and GHG reductions occur soon. Given the urgency of the situation, we can’t afford to invest in subpar solutions. As the IPCC warns, “[e]very tonne of CO₂ emissions adds to global warming.”ⁱ The U.S. should not include forest biomass in policies and incentives intended to combat climate change unless the best available science demonstrates that doing so will not increase CO₂ in the near-term and will not harm vulnerable communities.

Expansions in bioenergy use undermine the Administration’s goals related to environmental justice due to pollutants emitted during production of feedstocks and energy generation. The American Lung Association has publicly opposed biomass combustion due to the air pollutants it creates.ⁱⁱ New research suggests that biomass combustion is a leading contributor to the public health burden of fine particulate matter (PM_{2.5}).ⁱⁱⁱ PM_{2.5} increases mortality and morbidity risks at levels well below common air quality standards, especially in vulnerable populations.^{iv} Increased PM burdens have also been associated with increased risk of mortality for COVID-19,^v potentially worsening existing racial disparities in the burden of this disease. In short, substituting one source of harmful emissions for another threatens to perpetuate existing inequities in pollution exposure in Black, brown, Indigenous, and low-income communities.

Industrial-scale bioenergy and biomass incineration were both specifically identified by the White House Environmental Justice Advisory Council’s Final Recommendations as “examples of the types of projects that will not benefit a community.”^{vi} Examples of community resistance to bioenergy installations further underscore similar concerns. Earlier this year, local organizers and activists in Springfield, MA achieved victory after a decade-long effort, when state officials revoked the permit for a proposed plant in this overburdened community.^{vii} Wood pellet manufacturing facilities throughout the southern U.S., which are 50% more likely to be located in low-income communities of color,^{viii} have also been met with strong community opposition. Violations of state and federal air quality regulations have resulted in numerous enforcement actions, fines,^{ix} and community-led lawsuits against pellet companies, and these communities continue to express concerns over exposure to dust and other pollutants.^x High rates of tree loss around these pellet mills also contribute to lower air and water quality and increased risk of flooding in local communities.

As the Administration identifies equitable and government-wide approaches to address the climate crisis, we call on you to develop a scientifically sound framework for bioenergy that addresses impacts to our air, climate, and vulnerable communities—and ensure that those affected have a

¹ Endnotes provided after signatures.

voice in decisions that may impact their health and quality of life. Once developed, this framework should be deployed in all relevant policy venues.

In the meantime, we urge the Administration to strongly oppose any congressional overreach related to bioenergy, including as part of congressional spending bills. Our groups strongly oppose the inclusion of language in the FY 2022 Interior, Environment and Related Agencies Appropriations Act on the science of biomass energy and its impacts on climate change. The language has appeared in two different forms since 2015,² both of which could be interpreted to direct the Environmental Protection Agency (EPA) and the Departments of Agriculture and Energy to focus on the purported benefits of forest bioenergy while ignoring its adverse carbon impacts. Although the FY 2022 language from the House represents an improvement, in directing agencies to “recognize” and “reflect” benefits broadly—when benefits may only exist in a narrow subset of circumstances—the rider represents congressional interference in agency processes to generate the best available climate science, directly contradicting the goals of Executive Orders 13990 and 14008.

EPA’s own Science Advisory Board has rejected the categorical treatment of biomass for energy production as carbon neutral and observed that different biomass feedstocks have varying carbon impacts.^{xi} Moreover, multiple deliberative scientific bodies have rejected the notion that biomass energy is uniformly carbon beneficial and have demonstrated that in many cases using forest biomass for energy can have significant adverse climate impacts. Earlier this year, more than 500 scientists addressed the leaders of the U.S., the European Union, Japan, and South Korea, to unpack the erroneous assumptions contained in the “carbon neutrality” categorization of forest bioenergy and to outline the ways these assumptions may undercut climate and biodiversity goals.^{xii} It is thus unsurprising that the Obama Administration denounced this provision in 2015 on these very grounds,^{xiii} and we urge the Administration to do the same if a similar rider is presented in this year’s spending bill.

We thank you once again for your leadership in addressing the climate crisis and rebuilding our nation to be more resilient and more equitable, and we look forward to working alongside you in this effort. We welcome any questions you might have.

CC:

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Respectfully submitted by the following 96 organizations:

² In previous iterations (FY15 to FY21), the rider (Sec. 434) directed agencies, inter alia, to “establish clear and simple policies for the use of forest biomass as an energy solution” that “reflect the carbon neutrality of forest bioenergy.” In FY22, the House Appropriations Committee draft (Sec. 432) instead directed agencies to “reflect the carbon benefits of forest bioenergy” and to ensure that policies related to forest bioenergy use the “best available science.”

National / Regional Organizations:

Anthropocene Alliance
Center for Biological Diversity
Clean Air Task Force
Climate Reality Leadership Corps
Conservation Law Foundation
Cooperate Earth
Dogwood Alliance
Deep South Center for Environmental Justice
Earthjustice
Environmental Integrity Project
GreenFaith
GreenLatinos
Healthy Gulf
Jean-Michel Cousteau's Ocean Futures Society
John Muir Project of Earth Island Institute
League of Conservation Voters

Mighty Earth
National Black Environmental Justice Network
National Wildlife Federation
Natural Resources Defense Council
Our Children's Earth Foundation
Partnership for Southern Equity
People's Justice Council
Pivot Point
Rachel Carson Council
Sierra Club
Southern Forests Conservation Coalition
Southern Environmental Law Center
SouthWings
The Green Belt Movement International – NA
Union of Concerned Scientists
United Plant Savers

State / Local Organizations:

350 Ventura County Climate Hub
Alabama Interfaith Power & Light
Ashfield Alliance
Athens County's Future Action Network
Black Warrior Riverkeeper
Blue Ridge Environmental Defense League
California Environmental Justice Alliance
Cape Fear Audubon
Carolina Wetlands Association
Clean Water for North Carolina
CleanAIRE NC
Climate Reality Project Charlotte, NC Chapter
Climate Reality Project Raleigh, NC Chapter
Climate Reality Project Orange County, NC Chapter
Coastal Plain Conservation Group
Concerned Citizens of Cook County
Concerned Citizens of Northampton County
Concerned Citizens of Richmond County
Elders Climate Action - Massachusetts Chapter
Environmental Advocates NY
Environmental Transformation Movement of Flint
Extinction Rebellion Charlotte

Fayetteville Police Accountability Community Taskforce
GASP
Georgia Interfaith Power & Light
Island Wildlife - Cape Fear Region
JAPRI
Lakelands Citizens for Clean Air, Inc.
Lumber Riverkeeper
Massachusetts Forest Watch
NAACP Brunswick County Branch #5452
NAACP Charlotte Mecklenburg Branch
NAACP Georgia
NAACP New Hanover County Branch
NAACP Unified Robeson County Branch
NC Alliance to Protect Our People and the Places We Live
NC Climate Justice Collective
NC Climate Solutions Coalition
NC Conservation Network
NC Council of Churches
NC Interfaith Power & Light
NC League of Conservation Voters
NC WARN
North Carolina Environmental Justice Network

North Carolina Wildlife Federation
Northeast Ohio Black Health Coalition
Organized Uplifting Resources & Strategies
Our Beautiful Earth
RedTailed Hawk Collective
River Guardian Foundation
Robeson County Cooperative for Sustainable
Development
Rogers Eubanks Neighborhood Association
South Carolina Coastal Conservation League
Spruill Farm Conservation Project

Standing Trees Vermont
Steps Coalition
Sustain Charlotte
The Enviro Show
Toxic Free NC
U2U
Waccamaw Riverkeeper
Wendell State Forest Alliance
West End Revitalization Association
Winyah Rivers Alliance

ⁱ IPCC (2021). Summary for Policymakers. In: *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*. <https://www.ipcc.ch/report/ar6/wg1/#SPM> (p. 37).

ⁱⁱ American Lung Association. (28 May 2021). “Public Policy Position - Energy and Transportation.” <https://www.lung.org/policy-advocacy/public-policy-positions/public-policy-position-energy>.

ⁱⁱⁱ Buonocore *et al.* (2021). A decade of the U.S. energy mix transitioning away from coal: Historical reconstruction of the reductions in the public health burden of energy. *Environmental Research Letters*, 16(5). <https://doi.org/10.1088/1748-9326/abe74c> (p. 21).

^{iv} Orellano *et al.* (2020). Short-term exposure to particulate matter (PM₁₀ and PM_{2.5}), nitrogen dioxide (NO₂), and ozone (O₃) and all-cause and cause-specific mortality: Systematic review and meta-analysis. *Environment International*, 142, 105876. <https://doi.org/10.1016/j.envint.2020.105876>.

^v Petroni *et al.* (2020). Hazardous air pollutant exposure as a contributing factor to COVID-19 mortality in the United States. *Environmental Research Letters*, 15(9), 0940a9. <https://doi.org/10.1088/1748-9326/abaf86>.

^{vi} White House Environmental Justice Advisory Council. (21 May 2021). Final Recommendations: Justice40 Climate and Economic Justice Screening Tool & Executive Order 12898 Revision. <https://www.epa.gov/sites/production/files/2021-05/documents/whiteh2.pdf> (p. 59).

^{vii} Wasser, Miriam. (2 April 2021). “Mass. Revokes Air Permit For Controversial Biomass Facility In Springfield,” WBUR. <https://www.wbur.org/earthwhile/2021/04/02/springfield-biomass-permit-revoked>.

^{viii} Koester & Davis. (2018). Siting of Wood Pellet Production Facilities in Environmental Justice Communities in the Southeastern United States. *Environmental Justice*, 11(2), 64–70. <https://doi.org/10.1089/env.2017.0025>.

^{ix} Sneath, Sara. (25 February 2021). “Mississippi biomass facility fined for emitting three times more air pollution than permitted.” <https://southerlymag.org/2021/02/25/mississippi-biomass-facility-fined-for-emitting-three-times-more-air-pollution-than-permitted/>.

^x Southern Environmental Law Center. (4 June 2019). “Legal challenge forces N.C. wood pellet facility to install pollution controls.” <https://www.southernenvironment.org/news-and-press/news-feed/legal-challenge-forces-n.c.-wood-pellet-facility-to-install-pollution-controls>.

^{xi} The Science Advisory Board (SAB) found that “not all biogenic emissions are carbon neutral nor net additional to the atmosphere, and assuming so is inconsistent with the underlying science.” EPA SAB. (5 March 2019). “SAB review of Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources (2014).” [https://yosemite.epa.gov/sab/sabproduct.nsf/0/B86C81BACFAF9735852583B4005B3318/\\$File/EPA-SAB-19-002+.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/0/B86C81BACFAF9735852583B4005B3318/$File/EPA-SAB-19-002+.pdf) (p. 2).

^{xii} Letter Regarding Use of Forests for Bioenergy. (11 February 2021). <https://assets-woodwell.s3.us-east-2.amazonaws.com/wp-content/uploads/2021/02/12102409/Scientist-Letter-to-Biden-von-der-Leyen-Michel-Suga-Moon-Re.-Forest-Biomass-February-11-2021.pdf>.

See also a similar letter by more than 800 scientists, addressed to leaders of the European Union in 2018: <https://www.euractiv.com/wp-content/uploads/sites/2/2018/01/Letter-of-Scientists-on-Use-of-Forest-Biomass-for-Bioenergy-January-12-2018.pdf>.

^{xiii} Statement of Administration Policy, FY16. (23 June 2015). https://obamawhitehouse.archives.gov/sites/default/files/omb/legislative/sap/114/saphr2822r_20150623.pdf.