Defenders of Wildlife * Environmental Working Group * Friends of the Earth
Institute for Agriculture and Trade Policy * The Minnesota Project
National Environmental Trust * Natural Resources Defense Council * Sierra Club
Sustainable Agriculture Coalition * U.S. PIRG * Western Organization of Resource Councils
World Wildlife Fund

March 27, 2007

Dear Senator:

On behalf of our millions of members and activists we urge you to support sustainably produced bioenergy as a key component of a comprehensive strategy to reduce America's dangerous dependence on oil and to help solve global warming. Done right, bioenergy holds great potential to advance essential environmental and energy security goals. Pursued without adequate guidelines, however, bioenergy production carries grave risk to our lands, forests, water, wildlife, public health and climate. We therefore urge you to support the energy efficiency policies and performance standards that will ensure bioenergy meets its promise while avoiding collateral environmental damage.

The starting point for any constructive bioenergy policy, from increasing the size of the renewable fuel standard to enhanced biofuels programs in the Farm Bill, has to be much greater end-use energy efficiency. Efficiency policies such as raising Corporate Average Fuel Economy standards for vehicles and promoting smart growth in our cities are essential to reduce oil demand and ensure that our lands are not put under excessive pressure to produce biofuel feedstocks.

If not carefully managed, increased production of biofuels has the potential to cause widespread environmental devastation. Accelerated corn cultivation for ethanol, for example, threatens to deplete water tables, magnify contamination by fertilizers, pesticides, and herbicides, and undermine vital conservation programs like the Conservation Reserve Program. On farms and in forests across the country and abroad, imprudent biomass harvesting would cause soil erosion, water pollution, and habitat destruction, while also substantially reducing the carbon uptake of land. Advancing a biofuels policy that leads to conversion of land into a type that lowers its carbon uptake potential is a particularly perverse result for a policy that is intended to reduce global warming pollution.

Fortunately, we can manage and mitigate these bioenergy impacts through thoughtful legislation. Developing a sustainable bioenergy industry will require low carbon and other environmental performance standards. Attached, we respectfully include a set of guiding principles that provide the basis for such standards.

New policies are also needed to accelerate the transition to bioenergy produced from feedstocks such as cellulosic crops grown in sustainable systems. These policies include research and development on feedstocks such as native perennials, incentives for bioenergy production

facilities with a preference for local ownership, and programs that help farmers make the transition to growing feedstocks in sustainable agronomic systems.

Again, bioenergy holds great promise as a tool for reducing global warming pollution, breaking our dangerous oil addiction, and revitalizing rural economies, as long as we shape the nascent bioenergy industry to provide these benefits in a sound and truly sustainable fashion. We look forward to working with you on this important and challenging issue.

Sincerely,

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Bioenergy Feedstock Guiding Principles

- *The use of bioenergy must reduce greenhouse gas emissions.* Depending on how it is produced, bioenergy can significantly lower or increase greenhouse gasses. Key factors include the amount and sources of energy used to produce biofuels, and the potential direct or indirect conversion of carbon-sequestering forests and grasslands to lower carbon bioenergy feedstocks. To assure benefits, new incentives and requirements for increased use of biofuels need to be tied to significant reductions in the greenhouse gas intensity of these fuels. Practices that negate the greenhouse gas benefits of biofuels include conversion of native grasslands to produce biofuel feedstocks, loss of old growth forests, intensified tillage, and use of coal to power ethanol plants.
- *Biomass used for bioenergy has to be renewable.* Biomass must be regrown on site, recapturing its released carbon, so that it is genuinely sustainable – unless it is the by-product of activity with independent, over-riding social utility (like removal of vegetation immediately around wildland-interface homes).
- *Bioenergy feedstocks must not be grown on environmentally sensitive lands*. Such lands include: old growth forests; wilderness study areas; roadless areas on national forests; native grasslands; important wildlife habitat; ecosystems that are intact, rare, high in species richness or endemism, or exhibit rare ecological phenomena.
- *Conversion of natural ecosystems must be avoided*. Habitat loss from the conversion of natural ecosystems represents the primary driving force in the loss of biological diversity worldwide. Activities to be avoided include those that alter the native habitat to such an extent that it no longer supports most characteristic native species and ecological processes.
- *Exemptions and waivers from environmental rules must not be used to promote biomass production or utilization*. Trading one serious environmental harm for another is poor policy. Our environmental laws and regulations act as a fundamental system of checks and balances to guard against just such collateral damage and the promotion of bioenergy production and utilization must in no way be exempted.
- *Conservation and Wetland Reserve Programs supported by the Farm Bill must be managed for their conservation benefits.* These programs protect marginal lands, water quality, soil, and wildlife habitat. Enrolled lands need to be managed principally for these important values, not bioenergy feedstocks.
- *Independent certification, market incentives, and minimum performance requirements are necessary to ensure that bioenergy feedstocks are produced using sustainable practices.* Certification standards for biomass from private lands must address key environmental and social objectives, such as protection of wildlife habitat, prevention of erosion, conservation of soil and water resources, nutrient management, selection of appropriate feedstock species, and biologically-integrated pest management. New policies are needed to ensure that producers, refiners and distributors adhere to minimum performance requirements and have incentives to maximize environmental performance at each step.
- *Stringent safeguards must be established for bioenergy production from feedstock derived from federal land.* Federal lands, including wildlife refuges, BLM lands, national forests and grasslands, are held subject to the public's interest in their non-commodity values. They are not appropriate for large-scale, sustained biomass sourcing.