

September 27, 2023

Re: Climate and justice commitments exclude woody biomass from 48C funding

Secretary Granholm,

The Biden Administration has made important commitments to addressing climate change and environmental injustices. We are concerned that the Department of Energy, Treasury, and Internal Revenue Service's implementation of the 48C Qualifying Advanced Energy Project Credit could undermine these commitments by subsidizing carbon-intensive woody biomass projects, such as wood pellet mills. The 48C credit, which was expanded in the Inflation Reduction Act, is intended to be used for an energy transition away from polluting energy – we must not divert its limited funding towards projects that continue to perpetuate harms to the climate and communities on par with fossil fuel combustion.

Logging our forests to burn wood for energy is a highly polluting and carbon-intensive process. It worsens climate change and harms surrounding communities. Each step of the wood biomass supply chain, from harvesting and transportation to processing and combustion, emits significant amounts of greenhouse gases. Burning woody biomass fuels emits more carbon emissions than burning fossil fuels, per unit of energy generated. It can take over a century for forests to regrow and absorb the same amount of carbon that is instantly released through burning woody biomass. Even if industry promises of forest regrowth were demonstrable or enforceable, the immediacy of the climate crisis demands a rapid pivot away from using wood as fuel due to increased emissions, foregone sequestration, and community harms.¹

In addition to the climate costs, woody biomass energy projects are antithetical to the Biden Administration's commitments to environmental justice. The White House Environmental Justice Advisory Council explicitly names bioenergy projects as not benefiting a community.² The American Lung Association³ and the National Association for the Advancement of Colored

¹ Thomas Walker, *et al.*, Biomass Sustainability and Carbon Policy Study (June 2010) <https://www.mass.gov/files/documents/2016/08/qx/manomet-biomass-report-full-hirez.pdf>; John Gunn, *et al.*, *Scientific Evidence Does Not Support the Carbon Neutrality of Woody Biomass Energy: A Review of Existing Literature*, Spatial Informatics Group Report 2018-01, (Oct, 2018), <https://www.sig-nal.org/reports-and-tools>; Mary S. Booth, Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy. *Environmental Research Letters*, Feb. 21, 2018, at <https://iopscience.iop.org/article/10.1088/1748-9326/aaac88>; Brack, D., Birdsey, R., & Walker, W. (2021) "Greenhouse gas emissions from burning US-sourced woody biomass in the UK," Chatham House, UK <https://www.chathamhouse.org/2021/10/greenhouse-gas-emissions-burning-us-sourced-woody-biomass-eu-and-uk>).

² White House Environmental Justice Advisory Council Final Recommendations: Justice40, Climate and Economic Justice Screening Tool and Executive Order 12898 Revisions <https://www.epa.gov/environmentaljustice/white-house-environmental-justice-advisory-council-final-recommendations>

³ American Lung Association Policy Position on Energy <https://www.lung.org/policy-advocacy/public-policy-positions/public-policy-position-energy>

People (NAACP)⁴ are also vocally opposed to woody biomass production and combustion. Wood pellet manufacturing and biomass combustion are large sources of air pollution, including PM 2.5, NOx, and VOCs, as well as hazardous or toxic air pollutants.⁵ These pollutants are extremely harmful to the surrounding communities and can cause heart, lung, and respiratory issues, as well as increased premature mortality. These health risks are even higher within low wealth and minority communities.⁶ These communities have historically been targeted for harmful energy and manufacturing projects, including wood pellet production.⁷ This environmental injustice must not be exacerbated through the DOE's implementation of 48C.

Despite the scientific consensus concerning the climate impacts of woody biomass-based energy and the well-documented harms to environmental justice communities from wood pellet manufacturing, the industry is attempting to prop-up its greenwashed practices with government funding. In their Q2 earnings call, Enviva reported that it had applied for the first round of 48C funding to subsidize their wood pellet projects in Epes, Alabama, and Bond, Mississippi.⁸

Applications for woody biomass projects are wholly inconsistent with the intent of 48C and the Department of Energy's own criteria for recommendation - which include prioritizing projects with the greatest reduction of greenhouse gases and other pollution. Unlike a facility that manufactures materials for truly renewable energy, such as solar panels or wind turbines, a wood pellet mill produces a fuel source that, when combusted for energy, emits more carbon dioxide than the fossil fuels it's replacing.

The Biden Administration's commitments to climate and environmental justice would be seriously undermined by financial subsidies or support for woody biomass projects. There is no 'climate friendly' way to produce fuel from wood - be it wood pellet mills, wood-based aviation fuel, or wood burning heat and power. Pretending otherwise has direct and tangible impacts on public health and the climate. We call on the Department of Energy to discourage Enviva's and any other applicant's concept paper for woody biomass projects, and to withhold funding recommendations from any such future applications.

⁴ NAACP Resolution in Opposition to Wood Pellets Manufacturing and Use of Wood-Bioenergy <https://naacp.org/resources/resolution-wood-pellets-opposition>

⁵ Patrick Anderson and Keri Powell, Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act, April 2018, <https://www.environmentalintegrity.org/wp-content/uploads/2017/02/Biomass-Report.pdf>

⁶ Qian Di, M.S. et al., Air Pollution and Mortality in the Medicare Population. *New England Journal of Medicine* 377:15, 1497-1499. (2017), <http://www.nejm.org/doi/full/10.1056/NEJMoa1702747>

⁷ Stefan Koester and Sam Davis. Siting of Wood Pellet Production Facilities in Environmental Justice Communities in the Southeastern United States. *Environmental Justice*, Vol. 11, No. 2, pp. 64-70. Apr 2018 at <http://doi.org/10.1089/env.2017.0025>

⁸ Enviva Q2 2023 Earnings Call Transcript, <https://finance.yahoo.com/news/enviva-inc-nyse-eva-q2-170412174.html>

198 methods
Athens County's Future Action Network,
ACFAN.org
Biofuelwatch
Dogwood Alliance

Earthjustice
Forest Keeper
Friends of the Earth US
GCS
John Muir Project

Mighty Earth
National Wildlife Federation
Natural Resources Defense Council
Partnership for Policy Integrity
Pivot Point

Rachel Carson Council
Rachel's Network
Save Chandler Mountain 501c3
Sierra Club
South Carolina Environmental Law Project

Southern Environmental Forests Coalition
Southern Environmental Law Center
SouthWings
Spruill Farm Conservation Project
World Stewardship Institute