



**COMMENTS AT EPA PUBLIC HEARING RE: 2020, 2021 AND 2022 RVOs
January 4, 2022**

My name is Carrie Annand. I am the executive director of Biomass Power Association. We are a trade association representing domestic biomass power producers across the country. Our members generate power and heat using organic waste like forestry byproducts and residues, nut shells, oat, and rice hulls as fuel. Typically, the fuel for a U.S. biomass power facility comes from within a 75-mile radius of the power plant.

The presence of a biomass power facility in a community means more local, and often rural, jobs and more value along the forestry or agricultural supply chain. Biomass power offers a much better option to get rid of organic byproducts than open burning – typically the alternative where a biomass facility is not located nearby. It is also a baseload power source, meaning that it runs 24/7 and is an ideal renewable complement to intermittent sources of power.

Biomass is especially crucial in places at a substantial risk of wildfire. Biomass facilities are integral to wildfire risk reduction efforts because they offer an outlet for high volumes of the flammable materials cleared from forests. In California, Arizona, Colorado and Oregon, our members consume flammable wood from at-risk forests, often in partnership with the U.S. Forest Service. A biomass facility not only uses these materials in a productive way; it also subjects them to environmental controls that dramatically reduce the greenhouse gases that would be released into the air if they were burned openly or caught fire in a wildfire.

Since President Bush signed the RFS2 bill into law, the renewable biomass industry has been promoting the opportunity that biomass presents to generate clean electricity for transportation use under the RFS program. Now, 14 years later, the biomass sector continues to be overlooked even though the promise of cleaner energy remains high.

Meanwhile, the number of electric vehicles on American roads has continued to grow and is expected to soar with this Administration's policies focusing on EV adoption. In 2011, there were only 16,000 EVs on U.S. roads; by 2021 more than 2 million cumulative EVs have been sold. In order for EVs to reach their full carbon savings potential, however, they need zero- and low-carbon feedstocks and clean power generating sources for charging. This will be even more important as economy-wide electrification gains momentum beyond transportation.

The great news is that this Administration has an opportunity to address these problems by approving electricity generating pathways into the Renewable Fuel program. Because electricity is already supported under existing RFS regulations, Congressional action is not necessary. However, electricity in the RFS enjoys strong bipartisan support on Capitol Hill. We have been informed by officials at the Agency that they intend to announce a process that will support adoption, approval and registration of renewable electricity generating facilities. While we are

disappointed that the Agency did not include specific regulatory proposed language for electricity in the 2020, 2021 and 2022 RVO proposal released in December, we remain hopeful that the Agency will issue a proposal that will finally support credit generation for renewable electricity under the program for 2023 and beyond.

President Biden has repeatedly articulated a commitment to rural jobs, forestry, wildfire risk reduction and EV adoption. The inclusion of electricity in the RFS would help advance all of these goals. We urge the EPA to act expeditiously and we remain available to help in whatever ways are needed.