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**Remarks on EPA Triennial Report -- August 1, 2018**

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Thank you, Jordan, and thank you to those who were able to call in today.

We are here to talk about the EPA's Second Triennial Report to Congress on biofuels and their impact on the environment. In finding that the Renewable Fuel Standard is having negative consequences to a whole suite of environmental indicators, the report is a red flag warning us that we need to reconsider the mandate's scope and its focus on first generation fuels made from food crops. If we do not, then we will continue to see less wildlife and wild land, and more air, water, and climate pollution.

Now how did this report come about? Recognizing that the massive biofuel mandate in the Renewable Fuel Standard had the potential to drive similarly massive environmental damage, Congress wisely included a requirement in law that EPA had to document and report on those impacts every three years.

The first Triennial Report was published in 2011. It was quite extensive in its scope, covering resources beyond those specified in law, and came following public comment and review. At that time, the program was still getting up to speed, with the RFS implementing regulations only recently finalized the year before. Nonetheless, the report's overall finding was that the RFS to that time had already had negative environmental impacts, though relatively minor in scope, stemming mostly from the increase in corn production to make ethanol.

It is only now, seven years after its first report – which is 4 years later than required by law – that EPA has released its Second assessment. After being faulted by its own Inspector General's office in 2016, the agency finally pulled this across the finish line after being sued by the Sierra Club for its failure to produce this report and a related study on air quality.

While this Second Triennial is not quite as thorough as the first, and was not put out for public comment and review prior to its release, and while buried on the Friday afternoon before the 4<sup>th</sup> of July week, the findings are fairly robust and quite stark.

The small negative impacts identified in the previous report have now amplified as the mandate has ramped up, and as the scientific literature has caught up with what has been occurring on the landscape. The report clearly documents that across the board,

biofuel production and combustion has contributed to worsening environmental conditions.

Millions of acres of wildlife habitat and native or natural lands lost to industrial crop production, air emissions and side effects worse than from the gasoline these fuels are replacing, far more nutrient pollution of our waterways, additional strain on already overtapped water supplies like the Ogallala Aquifer, loss of biodiversity and threats to imperiled species across farm country, and far more greenhouse gas emissions than previously estimated. This is the legacy of the RFS thus far.

This report comes at a critical time. The current Administration is strongly in favor of doubling down on this misguided policy by allowing even more ethanol in our fuel. Just last week, President Trump told an audience in Iowa that he was “very close” to having EPA issue a waiver to the Clean Air Act to allow year-round sale of E15. The Agency is currently taking comment on its proposed volumes for next year’s mandates, which would continue to increase the requirements despite the environmental impacts it cites in its report. Congress, for its part, is considering major changes to the RFS, with potential legislative action possible yet this year.

And now I will turn it over to the experts we have assembled to dig deeper into some of the report’s findings.