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GrowthEnergy.org

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Wayne Cascio
Director, Center for Public Health and Environment
Office of Research and Development (8101R)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004
Via Regulations.gov

Docket ID: EPA-HQ-ORD-2020-0682

RE: Pool of Candidate Peer Reviewers for the Biofuels and the Environment: Third Triennial Report to Congress

Dear Mr. Cascio:

Thank you for the opportunity to comment on the pool of candidate peer reviewers for the Third Triennial Report to Congress on Biofuels and the Environment. Growth Energy is the world's largest association of biofuel producers, representing 89 U.S. plants that produce more than 8 billion gallons of renewable fuel each year; 103 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio in order to grow more green energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuels for consumers.

We appreciate the agency's effort to provide input for peer review and specifically on the list of peer reviewers. When selecting peer reviewers, it is important that the panel fairly assess the science and data, and not simply project their own views on biofuels. It is also essential that the panel consider the most up-to-date science and the wealth of data that continues to show the consistent environmental benefits of biofuels like ethanol. Further, the panel must represent diverse expertise and viewpoints, and we encourage the agency to avoid selecting a panel that is biased toward reviewers with expertise in a limited set of disciplines. We strongly suggest the agency take these critical considerations into mind as they select panelists for the peer review.

To that end, it is paramount the agency review much of the environmental data that has been published and submitted as part of comments in various agency actions. Specifically, we would

point you to our extensive comments submitted in response to the agency's proposed renewable volume obligations for 2020 – 2022 (Docket # EPA-HQ-OAR-2021-0324, Growth Energy submission on February 4, 2022: [Growth-Energy-RVO-Comment Exhibits.pdf \(growthenergy.org\)](#)), especially the first five exhibits that demonstrate ethanol's positive contributions to the environment including substantial analysis of greenhouse gas emission reductions and air quality improvement. Additionally, it is important to consider our supplemental comment in the same docket that debunks many of the unfounded claims made recently by several of the potential panelists (Docket # EPA-HQ-OAR-2021-0324, Growth Energy submission on March 6, 2022: [Growth-Energy-Supplemental-Comment-on-2020-22-Reset-1.pdf \(growthenergy.org\)](#)). Related, we would also strongly urge the agency to consider the comments from scientists at Argonne National Laboratory (Comments on "Environmental Outcomes of the US Renewable Fuel Standard: [Argonne GREET Publication : Comments on "Environmental Outcomes of the US Renewable Fuel Standard" \(anl.gov\)](#) as well as our own comment on the EPA's recent workshop on Biofuel Greenhouse Gas Analysis (Docket # EPA-HQ-OAR-2021-0921 Growth Energy submission on April 1, 2022: [Growth-Energy-Comments-on-EPA-LCA-Workshop-4.1.2022.pdf \(growthenergy.org\)](#)). We are confident that the agency's review of this robust analysis will help guide their selection of peer reviewers for the upcoming report on biofuels and the environment.

Thank you for the opportunity to comment and in advance for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley".

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy