

**Renewable Fuel Standard**  
**Biomass Forest-Based Feedstock**  
**Hazardous Fuels Reduction**  
**RIN's Eligibility**

**Until recently, the United States was the only developed country in the world that did not recognize forest-based biomass as a carbon-neutral renewable resource.** This impeded the development and utilization of forest-based biomass feedstock to produce bio-crude, biochar, biofuel, and wood pellets.

The Renewable Fuel Standard (RFS), as Congressionally developed and intended, includes several categories. However, D-3 and D-7 categories have never been produced or recognized. The EPA's misinterpretation of eligible biomass feedstock is the single impediment to this. The EPA's determination contradicts all publicly and privately accepted biomass source standards. In fact, the USDA has advised the EPA of this contradiction and provided expertise to correct this discrepancy. Until this is resolved, billions of dollars in investment remain sidelined, and critical unmerchantable timber (hazardous fuels) markets remain undeveloped.



If and when this issue is resolved, the forest-based biomass feedstock can produce renewable bio-crude / biofuel and reduce fossil fuel use.

The correction of the EPA opinion is necessary before the USDA / USFS can fully implement many of the hazardous fuel reduction provisions in the Infrastructure Investment and Jobs Act and the Inflation Reduction Act. Otherwise, viable markets will not be developed to utilize the hazardous fuels, leaving them to be disposed of via burning (releasing carbon into the atmosphere).

Additionally, it is critically necessary to amend the faulty EPA Renewable Fuel Standard 2, definition of Areas of Risk of Wildfire, restriction of eligible biomass that is obtained from within 200 feet of buildings and other areas regularly occupied by people, or of public infrastructure, in an area at risk of wildfire, i.e., Wildland Urban Interface. Instead, eligible biomass should be designated by USFS wildfire hazard maps, and any high-priority wildfire landscape areas and fire sheds already identified by the USFS and further identified in the future.

The following letter was submitted to the White House following a discussion White House officials had regarding the fuel crisis and recommendations to address it.