

May 21, 2015

Public Meeting of the Biomass Research and Development Technical Advisory Committee

Good morning. My name is Aviva Glaser, I am a senior policy specialist with the National Wildlife Federation (NWF). Thanks for opportunity to comment today.

NWF has over 5 million members and supporters across the country. NWF believes that it is important that we transition to homegrown sources of renewable energy, and we appreciate all that the administration is doing to identify and promote new sources of renewable energy, including through research investments. However, it is critical that we move forward with these renewable energy sources in a way that does not threaten or harm our natural resources and native wildlife and does not have unintended consequences.

As some of you may know, with energy crops, we have a fundamental problem in that the characteristics that make a crop a great bioenergy crop – quick growing, hardy, tolerant, doesn't need a lot of inputs, etc- are the same characteristics that describe an invasive species. So by their fundamental nature, bioenergy crops are more likely to become invasive than other plants. **It is crucial that sensible precautions be taken to prevent invasions before they occur, and to ensure that there are no unintended consequences of investments in next generation bioenergy.**

Fortunately, there are effective screening tools to help assess the invasive potential of plants. Weed risk assessments are a well-established and accurate tool for evaluating the invasive species risk of plants and predicting which plants pose a high risk of harm. A variety of peer-reviewed WRA tools, including USDA's own, exist and are now available to quantify invasion risk presented by a species, hybrid, or cultivar.

It is critical, however, that weed risk assessment screening tools be incorporated into federal policies and programs, including federal bioenergy research and development programs, and that feedstocks that are invasive or potentially invasive be excluded from funding or incentives.

I want to specifically applaud the Department of Energy on their RFP on Landscape Design for cellulosic bioenergy feedstocks, which they released last fall. In that RFP, DOE specifically forbids feedstocks that have high potential for invasiveness, as determined by weed risk assessments. As DOE explains in its technical appendix: **"Projects may not cultivate any feedstock that is invasive or noxious or species or varieties of plants that credible risk assessment tools or other credible sources determine are potentially invasive."**¹

Given the potential economic and ecological repercussions should bioenergy crops escape and invade natural or agricultural areas, **I strongly urge all federal funding for bioenergy research to similarly require weed risk assessment screening and to prohibit invasive or potentially invasive feedstocks, as determined by credible weed risk assessment tools. Moreover, I strongly urge this technical advisory**

¹ <https://eere-exchange.energy.gov/Default.aspx?Search=landscape&SearchType=#Foaldfe2ab85d-f92e-4f03-a386-efe605acafe3>

committee to issue recommendations to federal agencies that they include this language in all bioenergy feedstock research and development programs.

Finally, I wanted to encourage this committee to include stakeholders who are experts on fish, wildlife, and invasive species, including stakeholders from the conservation and environmental community.

Thank you for this opportunity to comment. I look forward to continuing to work with you on this important issue.

Aviva Glaser
Senior Policy Specialist
National Wildlife Federation
1990 K St NW, Suite 430
Washington, DC 20006
202-797-6616 | GlaserA@nwf.org