Dear Administrator Jackson,

On behalf of our millions of members and activists, we urge EPA to account for indirect emissions from land use changes in its analysis of biofuels’ lifecycle greenhouse gas emissions for the proposed rule on the Renewable Fuels Standard (RFS-2), as required by the Energy Independence and Security Act (EISA) of 2007 (P.L. 110-140).

EISA sets a critical precedent as the first law that requires reductions in greenhouse gases. To achieve these reductions, EISA requires a full lifecycle inventory of greenhouse gas emissions caused by biofuel production, and is explicit that the “direct emissions and significant indirect emissions such as significant emissions from land use changes” be included. Ignoring the emissions from indirect land use change will undermine the environmental benefits of the RFS-2 and set a poor precedent for any future policies attempting to reduce global warming pollution from transportation and other sectors. Furthermore, to exclude these emissions from a proposed rule would directly contradict the law.

The EPA has already done significant work to analyze and model these types of emissions. The analysis of indirect emissions is complex, indeed, but numerous academic studies have developed calculations for these types of emissions and by all accounts, EPA is drawing from the best scientists and economists and using peer-reviewed models. Moving ahead with a rule but delaying or omitting the inclusion of indirect land use effects in the model would imply that farmland is limitless, and would ignore the major impact of agriculture and deforestation on the climate. This is clearly not supported by the science or by the statute. Instead, the proposed rule should be released with a full analysis of indirect emissions so that debate on its merits and how to improve it can occur in a public and transparent way.

President Obama has vowed to make the US a leader on climate change and to restore science to its rightful place in our policy. Now is the time to uphold those pledges, ignore the pleadings of industry lobbyists, and release a proposed rule based on the best science currently available to reduce our greenhouse gas emissions.
We look forward to the release of this rule and thank you in advanced for addressing our concerns.

Sincerely,

Rebecca R. Wodder
President
American Rivers

John Flicker
President
Audubon Society

Armond Cohen
Executive Director
Clean Air Task Force

John De Cock
President
Clean Water Action

Rodger Schlickeisen
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Defenders of Wildlife

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CC:
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Nancy Sutley, Chairwoman, Council of Environmental Quality
Steven Chu, Secretary, United States Department of Energy
Tom Vilsack, Secretary, U.S. Department of Agriculture