

**American Rivers * Audubon Society * Clean Air Task Force * Clean Water Action
Earthjustice * Environment America * Environmental Working Group
Defenders of Wildlife * Friends of the Earth * League of Conservation Voters
National Wildlife Federation * Natural Resources Defense Council
Network for New Energy Choices * Union of Concerned Scientists
Republicans for Environmental Protection * Sierra Club * The Wilderness Society**

The Honorable Lisa Jackson
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

March 19, 2009

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
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American Rivers

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CC:

Carol Browner, Assistant to the President for Energy & Climate Change

Peter Orszag, Director, Office of Management and Budget

Nancy Sutley, Chairwoman, Council of Environmental Quality

Steven Chu, Secretary, United States Department of Energy

Tom Vilsack, Secretary, U.S. Department of Agriculture