

**Action Aid International USA * Clean Air Task Force * Conservation International
Conservation Law Foundation * Defenders of Wildlife * Ecology Center
Environmental Working Group * Environment America * Environment Northeast
Friends of the Earth * Fresh Energy * League of Conservation Voters
League of Woman Voters of the United States * National Audubon Society
National Wildlife Federation * Natural Resources Defense Council
The Nature Conservancy * Sierra Club * Southern Alliance for Clean Energy
Union of Concerned Scientists * The Wilderness Society**

Representative Henry Waxman
2204 House Rayburn Building
Washington, DC 20515

Representative Joe Barton
2109 House Rayburn Building
Washington, DC 20515

May 19, 2009

Dear Representative,

On behalf of our millions of members and activists, we are writing to express our opposition to any attempt to weaken the Renewable Fuel Standard's definition of life-cycle greenhouse gas emissions of biofuels and exclude emissions from indirect land-use change.

In December 2007, Congress agreed to include greenhouse gas emissions from indirect land-use change as part of the assessment of the full lifecycle emissions of biofuels. Since then, scientific research has demonstrated the wisdom of Congress' decision. This research continues to demonstrate that biofuel policies, like the Renewable Fuel Standard, would accelerate global warming if the policy shifts farmland or forests from food and fiber production to biofuels feedstock production. Such shifts increase the demand for land and thus encourage farmers and foresters around the world to convert forests, wetlands, grasslands, and other natural areas into farmland until supply meets demand again. As land is cleared for farming or grazing, enormous amounts of soil- and plant-carbon are released into the atmosphere.

Including emissions from indirect land-use change is the only tool we have to direct the biofuels industry towards sources of biomass that do not cause such a shift. Including these emissions in the life-cycle assessment of greenhouse gases from biofuels is therefore critical to protecting forests and native ecosystems from the consequences of increased biofuels production. In addition, by discouraging shifts in land from food and fiber production, considering emissions from indirect land-use change helps keep biofuels from contributing to food price spikes.

Our organizations are adamantly opposed to any provision that would weaken the greenhouse gas emission standards in the Renewable Fuels Standard. Weakening the standards would contradict the best and most recent science available; this science has been painstakingly analyzed by experts at EPA and incorporated into proposed regulations implementing the Renewable Fuel Standard. All parties concerned have the opportunity now to comment on EPA's proposed rule and weigh in on the integrity of the science – this is the appropriate venue for addressing concerns. Last month, regulators in California confirmed that emissions from indirect land-use are indeed significant and chose to include

them in their life-cycle assessment of greenhouse gas emissions from biofuels. The analysis supporting the approved rule in California and the proposed EPA rule together suggest that emissions from indirect land-use alone are equal to between 30% and 60% of gasoline's emissions.

The scale and significance of these emissions clearly overwhelms the uncertainty as to their exact value. Removing them is the equivalent of assuming these emissions don't exist, which is not only bad for the climate, but it will also mislead investors and developers.

Last month more than 170 scientists, including a number of Nobel Laureates wrote to the California Air Resources Board:

As scientists and economists with relevant expertise, we are writing to recommend that you include indirect land use change in the lifecycle analyses of heat-trapping emissions from biofuels and other transportation fuels. This policy will encourage development of sustainable, low-carbon fuels that avoid conflict with food and minimize harmful environmental impacts.¹

President Obama has called for the restoration of scientific integrity in federal policy-making. We now ask that you heed the President's call and oppose any provision that would exclude indirect land-use change emissions in the life-cycle assessment of biofuels.

Sincerely,

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Friends of the Earth

Charles Griffith
Clean Car Campaign Director
Ecology Center

Tiernan Sittenfeld
Legislative Director
League of Conservation Voters

¹ Letter addressed to Mary D. Nichols, chairman of the California Air Resources Board from 177 scientists on April 21, 2009.

Judy Duffy
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CC: House Environment and Commerce Committee