



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 17 2011

THE ADMINISTRATOR

Ms. Julie M. Sibbing  
National Wildlife Federation  
901 E Street, NW, Suite 400  
Washington, D.C. 20004

Dear Ms. Sibbing:

This letter is in response to your May 24, 2010, petition to the U.S. Environmental Protection Agency for reconsideration of the final Regulation of Fuels and Fuel Additives: Changes to Renewable Fuel Standard Program, 75 FR 14670, March 26, 2010, and request for a stay for a portion of that rule pending reconsideration.

In your petition, you requested reconsideration on the issue of the EPA's adoption of the "aggregate compliance approach" as part of implementing the requirements for renewable biomass for certain feedstocks grown in the United States.

The EPA considers the renewable biomass provisions to be an important part of the renewable fuel standard program and has carefully reviewed the arguments and information provided on this issue. For reasons discussed in detail in the enclosed response, the EPA is denying your petition for reconsideration and also denying the request for an administrative stay pending reconsideration.

We thank you for your interest in these issues, and the EPA looks forward to working with all stakeholders to implement the RFS2 program. Should you have any questions, please contact Paul Argyropoulos in the EPA's Office of Transportation and Air Quality at (202) 564-1123 or [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa P. Jackson".

Lisa P. Jackson

Enclosure



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WASHINGTON, D.C. 20460

FEB 17 2011

THE ADMINISTRATOR

Mr. Jonathan F. Lewis  
Ms. Helen D. Silver  
Clean Air Task Force Inc.  
18 Tremont Street, Suite 530  
Boston, Massachusetts 02108

Dear Mr. Lewis and Ms. Silver:

This letter is in response to your May 24, 2010, petitions to the U.S. Environmental Protection Agency for reconsideration of the final Regulation of Fuels and Fuel Additives: Changes to Renewable Fuel Standard Program, 75 FR 14670, March 26, 2010, and requests for a stay pending reconsideration.

In your petitions you raised concerns with two issues associated with the final RFS2 rule: the exclusion of the global "rebound" effect in the lifecycle analysis used in determining compliance with the required greenhouse-gas-emissions thresholds for various renewable fuels and the adoption of the "aggregate compliance approach" as part of implementing the requirements for renewable biomass for certain feedstocks grown in the United States.

The EPA considers the renewable biomass provisions and the lifecycle greenhouse-gas-emissions threshold requirements to be important parts of the RFS2 program and has carefully reviewed the arguments and information provided on these two issues. For reasons discussed in detail in the enclosed response, the EPA is denying your petitions for reconsideration and also denying your requests for a stay of the rule pending reconsideration.

We thank you for your interest in these issues, and the EPA looks forward to working with all stakeholders to implement the RFS2 program. Should you have any questions, please contact Paul Argyropoulos in the EPA's Office of Transportation and Air Quality at (202) 564-1123 or [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov).

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THE ADMINISTRATOR

Ms. Gina De Ferrari  
World Wildlife Fund  
1250 24<sup>th</sup> Street, NW  
Washington, D.C. 20037

Dear Ms. De Ferrari:

This letter is in response to your May 24, 2010, petition to the U.S. Environmental Protection Agency for reconsideration of the final Regulation of Fuels and Fuel Additives: Changes to Renewable Fuel Standard Program, 75 FR 14670, March 26, 2010, and request for a stay for a portion of that rule pending reconsideration.

In your petition, you requested reconsideration on the issue of the EPA's adoption of the "aggregate compliance approach" as part of implementing the requirements for renewable biomass for certain feedstocks grown in the United States.

The EPA considers the renewable biomass provisions to be an important part of the renewable fuel standard program and has carefully reviewed the arguments and information provided on this issue. For reasons discussed in detail in the enclosed response, the EPA is denying your petition for reconsideration and also denying the request for an administrative stay pending reconsideration.

We thank you for your interest in these issues, and the EPA looks forward to working with all stakeholders to implement the RFS2 program. Should you have any questions, please contact Paul Argyropoulos in the EPA's Office of Transportation and Air Quality at (202) 564-1123 or [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov).

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FEB 17 2011

THE ADMINISTRATOR

Mr. David Hirsch  
Managing Director  
Friends of the Earth  
1100 15<sup>th</sup> Street, NW, 11<sup>th</sup> Floor  
Washington, D.C. 20005

Dear Mr. Hirsch:

This letter is in response to your May 24, 2010, petition to the U.S. Environmental Protection Agency for reconsideration of the final Regulation of Fuels and Fuel Additives: Changes to Renewable Fuel Standard Program, 75 FR 14670, March 26, 2010, and request for a stay for a portion of that rule pending reconsideration.

In your petition, you requested reconsideration on the issue of the EPA's adoption of the "aggregate compliance approach" as part of implementing the requirements for renewable biomass for certain feedstocks grown in the United States.

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We thank you for your interest in these issues, and the EPA looks forward to working with all stakeholders to implement the RFS2 program. Should you have any questions, please contact Paul Argyropoulos in the EPA's Office of Transportation and Air Quality at (202) 564-1123 or [argyropoulos.paul@epa.gov](mailto:argyropoulos.paul@epa.gov).

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