



Congress of the United States  
House of Representatives  
Washington, DC 20515-4905

December 13, 2017

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator Pruitt:

Recently, the Environmental Protection Agency (EPA) finalized its Renewable Fuel Standard (RFS) volumes for 2018, proposing that 19.29 billion gallons of renewable fuel be blended in our fuel supply, with the lion's share going to conventional biofuel.<sup>1</sup> While a primary driver behind the RFS's creation and expansion was to give the United States greater energy independence<sup>2</sup>— an issue that has largely been addressed thanks to our domestic oil and natural gas renaissance — many of its congressional champions continue to tout its supposed environmental benefits, including its positive impact on reducing carbon dioxide (CO<sub>2</sub>) emissions associated with climate change.<sup>3</sup>

A recent study published by the University of Wisconsin-Madison, however, questions the degree to which our biofuels mandate actually reduces carbon emissions. Their research found that the expansion of cropland that occurred from 2008-2012 resulted in the release of significant carbon deposits from the soil, and that these emissions were largely driven by the conversion of grasslands into land for crop production.<sup>4</sup> This spike in land conversion coincided with enactment of the Energy Independence and Security Act of 2007, which greatly expanded our biofuels mandate. The release of extra carbon is notable, as the greenhouse gas is a contributor to climate change.<sup>5</sup> What's more, due to its lower energy content, gasoline blended with ethanol get fewer miles per gallon than regular gas,<sup>6</sup> meaning cars require more of it to travel the same distance, further hurting the claim that the RFS is environmentally friendly.

Further analysis into biofuels from university researchers is not only welcomed, but needed, as EPA has not fulfilled its statutory obligation to inform Congress on the environmental and conservation impacts of the RFS and hasn't completed a triannual congressional impact report since 2011.<sup>7</sup>

<sup>1</sup> <https://www.epa.gov/newsreleases/epa-finalizes-rfs-volumes-2018-and-biomass-based-diesel-volumes-2019>

<sup>2</sup> <https://www.epa.gov/laws-regulations/summary-energy-independence-and-security-act>

<sup>3</sup> [https://www.eenews.net/assets/2015/11/20/document\\_gw\\_12.pdf](https://www.eenews.net/assets/2015/11/20/document_gw_12.pdf)

<sup>4</sup> [http://www.gibbs-lab.com/wp-content/uploads/2017/11/spawn\\_Summary.pdf](http://www.gibbs-lab.com/wp-content/uploads/2017/11/spawn_Summary.pdf)

<sup>5</sup> <https://science2017.globalchange.gov/>

<sup>6</sup> <https://www.fueleconomy.gov/feg/ethanol.shtml>

<sup>7</sup> [https://www.epa.gov/sites/production/files/2016-08/documents/epa\\_oig\\_20160818-16-p-0275.pdf](https://www.epa.gov/sites/production/files/2016-08/documents/epa_oig_20160818-16-p-0275.pdf)

In addition, your agency never completed an anti-backsliding study to determine if our ethanol mandate negatively impacts air quality.<sup>8</sup>

As we approach 2022, when the statutory volume requirement for biofuels ends,<sup>9</sup> it's critical that policymakers have a complete picture of how the RFS affects not only our economy, but also our environment. With this in mind, please answer the following questions by January 31, 2018:

I. Does the RFS increase the amount of carbon released into the atmosphere?

II. Is EPA concerned by the amount of grasslands and forestlands that have been converted into cropland in recent years?

III. Does EPA take into account the effects our biofuels mandate has on land and air quality – including carbon emissions – when determining annual renewable fuel volume obligations (RVOs)?

- If yes, how do the results impact your decision making?

IV. Do I have your assurance that EPA will, as required, complete and send Congress an updated triannual congressional impact study on the RFS?

- If yes, when can it be expected?
- If no, why can't it be completed?

V. Do you think it would be beneficial for EPA to complete an anti-backsliding air quality study before announcing future RVOs?

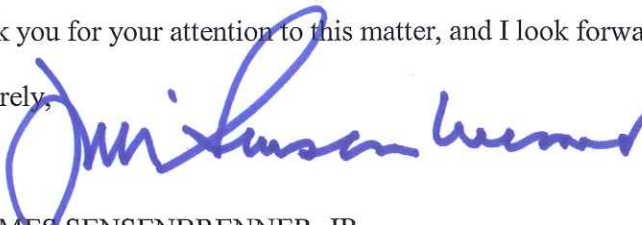
- If no, why not?

VI. Do I have your assurance that EPA will, as required, send Congress an anti-backsliding air study on the RFS?

- If yes, when can it be expected?
- If no, why can't it be completed?

Thank you for your attention to this matter, and I look forward to your response.

Sincerely,



F. JAMES SENSENBRENNER, JR.  
Member of Congress

<sup>8</sup> [https://www.epa.gov/sites/production/files/2016-08/documents/\\_epaig\\_20160818-16-p-0275.pdf](https://www.epa.gov/sites/production/files/2016-08/documents/_epaig_20160818-16-p-0275.pdf)

<sup>9</sup> <https://www.afdc.energy.gov/laws/eisa.html>