



**National Advisory Council for  
Environmental Policy and Technology**

December 15, 2008

The Honorable Stephen L. Johnson  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: NACEPT's Fourth Advice Letter to the Administrator on Biofuels

Dear Administrator Johnson,

In January, 2007, NACEPT requested that EPA start an "Agency-wide dialogue on EPA's role in the biofuels mission and develop an integrated, collaborative, multi-media biofuels strategy." We have now reviewed the Draft Biofuels Strategy and wish to express our sincere appreciation for the work done by so many people. This Strategy exceeds our expectations. It is an important achievement in itself, and one which will serve as a model of intellectual and programmatic integration. The ability of over ninety people throughout the agency to form this consensus using sustainability as the unifying concept bodes well for a new approach to the environmental challenges of today.

The Draft Biofuels Strategy provides an excellent primer for EPA's legal and programmatic responsibilities. In doing so it identifies key research and important management issues for the Agency and current and potential demands on EPA if it is to carry out its responsibilities. The intertwined relationships of the federal agencies working on biofuels and EPA's proper place in this group are aptly defined.

The most important contribution of the Strategy is to provide an intelligent guide on how biofuels related issues should be identified and reviewed. This Biofuels Supply Chain framework supports the entire Strategy and provides a lingua franca to all who work on biofuels. It is already being used by other agencies and the biofuels industry to facilitate communication and coordination across organizations with very different structures and roles.

We do have some relatively modest recommendations to make with respect to the format of the document. We would suggest that the five principle recommendations be moved to the front of the document, along with the 22 specific recommendations. With the integration of the Executive Summary, this will make a proper stand-alone "strategy" document. Then the remainder of the document can be condensed as background. There are several very informative charts, easily used by many, which should be included. We especially like "The Biofuels Supply

Chain,” “EPA Mandates Related to Biofuels” and “Key Agencies” involved in each portion of the supply chain.

The Biofuels Strategy would be greatly enhanced with the setting of priorities and deadlines. This part, of course, could be updated and reviewed over time. In any event, there are deadlines in statutes, and more importantly, internal deadlines for biofuels sustainability related issues which should be set now for the shorter term to keep pace with developments in industry and other parts of government.

We call your attention to NACEPT’s report on Integrated Modeling which calls for increased use of and improvements in full life cycle modeling (<http://epa.gov/ocem/nacept/reports/pdf/nacept-im-final-advice-letter-092208.pdf>). Biofuels is an ideal place to apply this approach and EPA has already developed extensive life cycle modeling of greenhouse gas emissions, air emissions and other factors as a foundation for the soon to be proposed Renewable Fuel Standard rulemaking (RFS2). We recommend that EPA expand its ability to conduct further life cycle analyses related to other environmental sustainability parameters being developed in interagency discussions (e.g., water quality and quantity, biodiversity, etc.). Such an effort would be relevant to the EISA Section 204 Report to Congress that EPA is required to submit by 2010 and every three years thereafter, other EISA mandated studies, and would be of great interest to EPA programs and regions, and the federal inter-agency Biomass Research and Development Board.

The next large scale effort for the Biofuels Strategy will be to develop a thorough Implementation Strategy. The current effort should outline how this will be done, and be a milestone in the work suggested above. We will be looking for the Biofuels Strategy to be incorporated in the EPA Strategic Plan and the 2010 budget.

With the change of Administration, it will be important to convey to the Agency’s new Administrator the importance of the initiative EPA has been taking in this area, both for assuring the sustainability of the nation’s biofuel program and as a model for a more integrated, cross-media approach to environmental challenges.

Once again, we congratulate EPA for this rapid and serious beginning to a world class biofuels program.

Sincerely,

//Signed//

John L. Howard, Jr.  
Chair

cc: Robert Olson, Working Group Co-Chair  
Frank Stewart, Working Group Co-Chair  
Marcus Peacock, Deputy Administrator  
Charles Ingebretson, Chief of Staff

Ray Spears, Deputy Chief of Staff  
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