



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

January 20, 2023

OFFICE OF
AIR AND RADIATION

Mr. Johannes Escudero
Founder and CEO
Coalition for Renewable Natural Gas
1017 L Street, #513
Sacramento, California 95814

Re: Request for Additional Time to Comment on EPA's "Proposed Renewable Fuel Standards for 2023, 2024, and 2025," Docket ID No. EPA-HQ-OAR-2021-0427

Dear Mr. Escudero:

I am writing in response to your December 27, 2022, letter to U.S. Environmental Protection Agency ("EPA") Administrator Michael S. Regan requesting that EPA extend the February 10, 2023, deadline for comment on the Agency's Proposed Renewable Fuel Standards for 2023, 2024, and 2025.

Your letter requested an extension of 31 days to March 13, 2023. Your letter states that the current comment period is insufficient given the significance, scope, and complexity of issues to be addressed and that this problem is exacerbated by winter holidays effectively interrupting the comment period. You note in particular the Biogas Regulatory Reforms as an issue requiring additional time to meaningfully prepare comments.

EPA is bound by a deadline for issuing a final rule, and that deadline is relevant to the question of the comment period deadline. Specifically, EPA is subject to a court-ordered deadline to finalize the 2023 standards by June 14, 2023.¹ Extending the current comment period deadline would not allow EPA sufficient time to review and respond to comments, draft a final rule, and complete the rulemaking process by EPA's deadline. Expediently finalizing the RFS standards, particularly for 2023 and 2024, is an important priority for EPA. Your letter also suggests that EPA could extend the comment period for only the Biogas Regulatory Reform portion of the rule, however, this is not something we are able to do given it is not feasible for EPA to extend the comment period for only a portion of the rulemaking.

¹ *Growth Energy v. Regan*, No. 22-cv-01191-RC (D.D.C.), Document No. 12.

After considering your letter, and for the reasons articulated in the preceding paragraphs, EPA denies your request to extend the comment period.

Sincerely,



Joseph Goffman
Principal Deputy Assistant Administrator