

**Center for International Environmental Law * Clean Water Action
Defenders of Wildlife * Environment America * Environmental Defense Fund
Friends of the Earth * Natural Resources Defense Council
National Parks Conservation Association * National Wildlife Federation
Union of Concerned Scientists**

Mary Nichols
Chairman, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

April 14, 2009

Dear Chairman Nichols,

On behalf of our millions of members and activists, we voice our support for the Low Carbon Fuel Standard (LCFS) and urge the Air Resources Board to account for indirect emissions from land use changes in the standard.

The California LCFS sets a critical precedent as the world's first regulation to require reductions in greenhouse gas emissions from transportation fuels. To achieve these reductions, the LCFS must account for the full lifecycle inventory of greenhouse gas emissions caused by biofuel production, including both direct emissions and indirect emissions from land use change. Ignoring the emissions from indirect land use change will undermine the environmental benefits of the LCFS and set a poor precedent for any future policies attempting to reduce global warming pollution from transportation and other sectors. Furthermore, excluding these emissions from the regulation would directly contradict the best available science.

CARB has already performed significant work to analyze and model these types of emissions. The analysis of indirect emissions is complex, indeed, but numerous academic studies have developed calculations for these types of emissions. Over the past two years, ARB together with teams of scientists and economists from the University of California and Purdue University have drawn from the best available information and peer-reviewed models to account for these emissions. Their results show that these emissions are significant and cannot be ignored. Moving ahead with a rule but delaying or omitting the inclusion of indirect land use effects in the model would imply that farmland is limitless, and would ignore the major impact of agriculture and deforestation on the climate. This is clearly not supported by the science and is inconsistent with the goal of providing real reductions in greenhouse gas emissions.

We look forward to the Board's approval of this rule incorporating indirect land use change and thank you in advance for addressing our concerns.

Sincerely,

Daniel Magraw
President
Center for International Environmental Law

John DeCock
President
Clean Water Action

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Defenders of Wildlife

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National Parks Conservation Association

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Kevin Knobloch
President
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CC: Governor Arnold Schwarzenegger
Secretary Linda Adams, Cal/EPA
Board Members, California Air Resources Board
Mr. James Goldstene, Executive Officer, California Air Resources Board