

**Environmental Defense Response to
Questions for Governors' Task Force on Boutique Fuels Stakeholder Meeting
May 17, 2006**

Founded in 1967, Environmental Defense is a non-partisan, non-profit science-based advocacy organization with some 400,000 members nationwide.

- 1. EPA's 2001 study analyzed four different scenarios for reducing the number of boutique fuels. Do you agree with these options? Are there other options that should be addressed?**

Since 2001, there have been central developments in federal and local fuels policies in response to a variety of concerns including energy security, water quality contamination, the human health impacts of air pollution, and the desire to provide expansive economic support for agricultural sectors. These significant developments warrant a fresh, thoughtful examination of fuel options and implications.

- 2. Given the current state of fuel requirements, are the 2001 study findings regarding the cost, fungibility, air quality and supply of the four options still accurate?**

In light of the material developments since 2001, Environmental Defense respectfully recommends that EPA conduct a comprehensive, balanced examination of fuel issues considering a variety of relevant factors including, for example, new information about the health effects of air pollution such as ozone mortality, the collateral benefits of different fuel types in reducing global warming pollution and air toxics, the water quality impacts, the nation's increasing production capacity for ethanol and other biofuels, and costs.

- 3. What data would be needed to complete additional analysis on these four factors for boutique fuel options?**

We respectfully request that additional analysis be robust and transparent. Two areas, in particular, that warrant thoughtful examination are: (1) new information about the health effects of air pollution – including scientific research on the mortality impacts of ozone; and (2) a factually-grounded review of the considerations that inform the adoption of tailored fuel standards by local communities.

- 4. What do you see as the appropriate balance between state ability to adopt unique fuels to address air quality problems and limiting fuel types to manage supply/distribution concerns?**

We recommend that EPA's examination of the fuels issues include a review of representative case studies evaluating the considerations leading to the adoption of local fuel quality standards. Our experience is that local communities adopt calibrated fuel standards that reflect the deliberations of varied interests that are the hallmark of public policy discourse in America. A thoughtful look at these issues would illuminate the factors informing the adoption of local fuel standards that are tailored to meet the health and economic concerns of local communities.