

**From:** Adam Gustafson [gustafson@boydengrayassociates.com]  
**Sent:** 5/31/2018 10:15:10 PM  
**To:** Schwab, Justin [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eed0f609c0944cc2bbdb05df3a10aadb-Schwab, Jus]  
**Subject:** Re: Lifecycle analysis  
**Attachments:** 2-23-18 LCA update request letter to Pruitt.pdf; 3-26-18 USEPA response letter RE LCA update request letter to Pruitt from NCGA and 18 states.pdf; UAI Comment on 2018 RFS Rule.pdf

Justin,

Thank you for your time today. Here is the letter I mentioned concerning lifecycle analysis in the Triennial Report to Congress from several state corn growers associations and the National Corn Growers Association.

The second attachment is a response from Karl Simon at OTAQ.

We appreciate Mr. Simon's acknowledgement that "new research since the 2010 LCA has improved our understanding of biofuel lifecycle GHG emissions," and we are glad that his letter does not rule out the possibility of an updated lifecycle analysis in the forthcoming Triennial Report to Congress.

But the overall thrust of Mr. Simon's letter gives the impression that OTAQ has no intention of updating its lifecycle analysis. Indeed, that is what OTAQ told EPA's Inspector General in 2016. The IG noted that "ensuring the GHG lifecycle analysis is current could provide other benefits, such as informing EPA's decisions on setting RFS volumes after 2022." (IG Report No. 16-P-0275, at 9). Lifecycle analysis is also relevant to the mandatory consideration of "climate change" in any reset of the statutory volumes before 2022. 42 U.S.C. § 7545(o)(2)(B)(ii), *cited in* 42 U.S.C. § 7545(o)(7)(F).

Mr. Simon's letter seems to be based on some significant misunderstandings:

- Both the Department of Energy's GREET model and USDA's study include land-use change emissions, as required by the Clean Air Act's definition of "lifecycle greenhouse gas emissions." 42 U.S.C. § 7545(o)(1)(H).
- That law does not require any particular methodology, and USDA's report uses the same lifecycle emission categories as EPA's 2010 lifecycle analysis.
- Mr. Simon says that "given the inherent uncertainty associated with modeling of indirect emissions, the overall conclusions we can draw from this body of modelling have not changed." To the contrary, new empirical data proves that EPA's modeling grossly overestimated corn ethanol's effect on indirect land-use change and other factors. The third attachment is our comments addressing this new data.
- The GTAP-BIO model has been updated significantly since EPA declined to use it in 2010. By contrast, EPA's own land-use change model has not been revised, despite contrary evidence.

- Mr. Simon's view that EPA's lifecycle analysis "may not apply to other situations or policies" has not stopped foreign countries from restricting their imports of U.S. ethanol based on EPA's outdated science.

Thanks again.

Adam

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**From:** Adam Gustafson <gustafson@boydengrayassociates.com>  
**Date:** Thursday, May 31, 2018 at 10:07 AM  
**To:** "Schwab, Justin" <Schwab.Justin@epa.gov>  
**Subject:** Re: Lifecycle analysis

Will do. Here is a 3-page memo.

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**From:** "Schwab, Justin" <Schwab.Justin@epa.gov>  
**Date:** Thursday, May 31, 2018 at 10:03 AM  
**To:** Adam Gustafson <gustafson@boydengrayassociates.com>  
**Subject:** RE: Lifecycle analysis

If you call me that'll probably be best. There is one looming issue that could ripen in which case we will have to reschedule, but I am hopeful that will not happen.

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**From:** Adam Gustafson [mailto:gustafson@boydengrayassociates.com]  
**Sent:** Thursday, May 31, 2018 8:16 AM  
**To:** Schwab, Justin <Schwab.Justin@epa.gov>  
**Subject:** Re: Lifecycle analysis

I look forward to it. Shall I meet you in your office or call you at that number?

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**From:** Schwab, Justin <Schwab.Justin@epa.gov>  
**Sent:** Thursday, May 31, 2018 8:08:13 AM  
**To:** Adam Gustafson  
**Subject:** RE: Lifecycle analysis

Hello, Adam. I could talk between 2 and 3. The best number to reach my is my government cell

**Ex. 6**

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**From:** Adam Gustafson [mailto:gustafson@boydengrayassociates.com]  
**Sent:** Wednesday, May 30, 2018 5:26 PM  
**To:** Schwab, Justin <Schwab.Justin@epa.gov>  
**Subject:** Lifecycle analysis

Justin,

Stephen mentioned that he spoke with you about lifecycle analysis recently and recommended that I follow up with you. Do you have any time available tomorrow (Thursday) after 2pm or just about any time Tuesday-Friday next week? I look forward to catching up.

Adam

Ex. 6