



September 15, 2014

Ms. Katrina Sideco, Air Resources Engineer  
California Air Resources Board  
Transportation Fuels Branch

Dear Ms. Sideco:

On behalf of more than 40,000 members of the National Corn Growers Association (NCGA), we appreciate the opportunity to comment on the new concepts being considered for the California Low Carbon Fuel Standard Program as described in the August 22, 2014 workshop.

We are pleased to see the preliminary CI scores from the new GREET have decreased for corn ethanol. However, we feel there is much scientific data that has been collected and peer-reviewed and should be reflected in these calculations. Without having the actual model available to evaluate, namely CA-GREET 2.0, it is difficult to delineate our suggestions.

We look forward to CARB making the GREET 2.0 available so that we may provide input on the assumptions and data used to calculate the CI scores for corn ethanol.

Sincerely,

A handwritten signature in blue ink that reads "Martin R. Barbre". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Martin Barbre, President  
National Corn Growers Association