

April 28, 2017

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
Attn: LCFS GREET Model / iLUC Comments

**Request for Comments: California Low Carbon Fuel Standard (LCFS) - Review of Latest Scientific Data and Update to Indirect Land Use Change Values**

Dear Sir or Madam:

I am pleased to submit comments in response to the request at the Public Working Meeting for lifecycle assessment modeling held on Tuesday, April 4, 2017.

As you know I am a former member of the Expert Working Group on Land Use Change convened by CARB during 2010. The United States Department of Agriculture has recently released updated data on the greenhouse gas emissions from corn ethanol production:

<https://www.usda.gov/media/press-releases/2017/01/12/usda-releases-new-report-lifecycle-greenhouse-gas-balance-ethanol>

For direct and indirect land use change this documents leans heavily on data and methodologies from the Argonne National Laboratory Carbon Calculator for Land Use Change from Biofuels Production (CCLUB) model. I recommend to revisit the iLUC value for corn ethanol based on this latest data.

Please feel free to contact me with any questions at 312-316-3498 or [muellers@uic.edu](mailto:muellers@uic.edu).

Kind regards,



Steffen Mueller, PhD  
Principal Economist