

# United States Senate

WASHINGTON, DC 20510

July 20, 2016

The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator McCarthy:

We write to request that the Environmental Protection Agency (EPA) update its greenhouse gas life-cycle emissions analysis for corn ethanol to include consideration of the current state of the industry and the published scientific literature.

Comparing greenhouse gas emissions from different fuel sources cannot be limited to a tail pipe analysis alone. As you know, emissions from ethanol stem from a wide variety of sources: the production of fertilizer, farming practices, refining processes, fuel combustion, and land use changes from clearing land for corn production. A comprehensive evaluation of fuels therefore requires a full life-cycle, or “well to wheel,” approach. In 1996, Argonne National Laboratory developed a tool to evaluate greenhouse gas emissions across the fuel cycle from well to wheel, and has revised life-cycle estimates several times since.

Life-cycle fuel emissions analyses must be updated periodically to reflect improvements in technology and farming management. In 2010, the EPA projected that it would take until 2022 for most corn ethanol production facilities to achieve a minimum of a 20 percent reduction in life-cycle greenhouse gas emissions, relative to gasoline. The EPA has not updated its analysis since 2010, even though per acre corn yields have increased, ethanol refinery technologies have improved, production of co-products including distillers grains and corn oil have increased, and new land use models have demonstrated lower greenhouse gas emissions. These transformations are undoubtedly hard to anticipate, and many have occurred faster than the EPA had previously predicted. In fact, according to a study published by Argonne National Laboratory, corn ethanol is already achieving a 19 to 48 percent reduction in greenhouse gases as compared to gasoline—far before the EPA’s 2022 projection. The U.S. Department of Agriculture also recognized increased energy efficiency of corn ethanol production in a report earlier this year.

We ask the EPA to update its emissions analysis to both reflect recent changes in the ethanol and agricultural industries. When the EPA finalized the Renewable Fuel Standard (RFS) in 2010, it stated its commitment to improve upon and update its biofuel life-cycle emissions analysis. Unfortunately, the EPA has yet to update its analysis, and the Office of the Inspector General is conducting preliminary research to investigate this issue. Clarifying the climate and environmental impacts of corn ethanol will help industry, investors, and other interested parties—including the EPA—make more informed decisions about ethanol and other widely-used fuels. We look forward to working with you on this important issue.

Sincerely,



Al Franken  
United States Senator



Martin Heinrich  
United States Senator



Heidi Heitkamp  
United States Senator



Richard J. Durbin  
United States Senator



Amy Klobuchar  
United States Senator