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NATIONAL ACADEMIES OF SCIENCES, ENGINEERING, AND MEDICINE
CURRENT METHODS FOR LIFE CYCLE ANALYSES OF LOW-CARBON TRANSPORTATION
FUELS IN THE UNITED STATES
MEETING 4, PART II (VIRTUAL)
August 31, 2021

My name is Scott Richman, and I am the Chief Economist of the Renewable Fuels Association.

RFA believes that the committee should take into consideration a diversity of perspectives. However, the meetings to date have focused largely on land use change, and it is widely known some of the speakers have built their reputations on work skewed against ethanol.

This is exemplified by Dr. Lark's presentation. The first portion draws from research that uses a shared core approach. Researchers at Southern Illinois University Edwardsville pointed out severe flaws in these methods.[1] Lark's findings reflect false change, resulting from the improvement in the recognition of cropland in imagery over time. Additionally, he uses the Cropland Data Layer to estimate the conversion of grassland, even though USDA noted "the pasture and grass-related land cover categories have traditionally had very low classification accuracy."[2]

The last 10 minutes were devoted to research that has not been peer reviewed. The estimate of emissions from land use change lacks credibility and is far outside mainstream research. It is regrettable that a platform was provided for such allegations without an opportunity to review the work or equal time to discuss research that comes to a much different conclusion.

Regarding Dr. Plevin, the objective of his recent work appears to be to undermine models used in programs requiring reductions in the carbon intensity (CI) of fuels, in favor of his preferred policy of a carbon tax. While RFA agrees there needs to be continuous

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[1] Pritsolas J. and R. Pearson. 2021. "A Cautionary Tale: A Recent Paper's Use of Research Based on the USDA Cropland Data Layer to Assess the Environmental Impacts of Claimed Cropland Expansion." https://ethanolrfa.org/wp-content/uploads/2021/06/SIUE-Rebuttal-on-USDA-CDL-Use.pdf
 Pritsolas J. and R. Pearson. 2019. "Critical Review of Supporting Literature on Land Use Change in the EPA's Second Triennial Report to Congress." https://ethanolrfa.org/wp-content/uploads/2019/07/SIUE-Review-of-Land-Use-Change-Literature-07-2019.pdf
[2] USDA. 2021. "Research and Science: CropScape and Cropland Data Layer – FAQs." NASS. https://www.nass.usda.gov/Research_and_Science/Cropland/sarsfaqs2.php

improvement in modeling, we do not believe CI estimates have to achieve absolute certainty before being used in policies that mitigate climate change today. Further, uncertainty works in both directions: A growing body of research shows that land use change estimates used by regulators likely overstate the extent of the change and resultant emissions.

Thank you.