August 31, 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Docket ID EPA-HQ-OAR-2017-0091

Dear Administrator Pruitt,

The Minnesota Corn Growers Association (MCGA) appreciates the opportunity to provide comments on behalf of more than 7,000 farmer members on the proposed rule for the 2018 volume standards under the Renewable Fuel Standard (RFS) program.

Since Congress expanded the RFS in 2007, America’s corn farmers have stepped up and made significant contributions towards the RFS goals of increasing energy security through the production and use of renewable fuels, improving air quality and protecting consumers. America’s corn farmers have grown enough corn to meet the demands of the RFS, while still safely and securely providing food, feed and fiber for a growing global population.

We are encouraged and very supportive of the U.S. Environmental Protection Agency’s (EPA) 2018 proposal for conventional fuel at 15 billion gallons. When Congress expanded the RFS in 2007, it was intended for conventional fuel volume obligations to be set at 15 billion gallons for each year beginning in 2015. We appreciate that EPA has proposed a 2018 rule that meets the intent of Congress for conventional fuel and ask that you maintain it in the final rule.

Although we are supportive of the 2018 proposal for conventional biofuel, we are concerned by EPA’s proposal to reduce the overall renewable fuel obligation by 40 million gallons and a 73 million gallon reduction for the cellulosic volume target, compared to the final 2017 targets. Although cellulosic fuels have faced previous commercialization challenges, reducing the blending obligations for 2018 sends the wrong signal, especially when cellulosic ethanol production increased in 2016 and while new production facilities are coming online.

In addition to conventional biofuel, corn is an important feedstock for advanced and cellulosic fuel production and provides another significant market for corn. The RFS has provided America’s corn farmers an important value-added market for their grain and consumers have benefited with cleaner air and increased reliance on domestic fuel production. Due to advanced technology and crop yield increases, America’s corn farmers have met renewable fuel demand while still supplying corn for livestock feed, as well as other food, industrial uses and exports.

However, American corn farmers are facing a fourth consecutive year of depressed farm income and commodity prices. This situation has increased financial challenges and decreased equity for corn growers. Especially at a time when commodity market dynamics are making it difficult for corn farmers to be profitable, we strongly encourage EPA to utilize a forward-looking methodology when determining...
cellulosic fuel volume obligations and to look more closely at 2017 production data, which will be available before setting final 2018 volumes.

MCGA is committed to helping implement the RFS. We have collaborated with state and national partners to provide funding for renewable fuel infrastructure projects all across Minnesota to improve consumer access to higher biofuel blends.

We have worked closely with Minnesota’s biofuel facilities to improve the efficiency of the production process and the corn feedstock supplied to our state’s 20 ethanol plants. We strongly encourage EPA to update its life-cycle analysis for corn-based ethanol, which was last completed in 2010. This needed update would use the most recent data to better reflect current production practices and communicate the positive energy, carbon and environmental benefits of renewable biofuel to consumers and foreign and domestic customers.

As EPA moves towards finalizing 2018 renewable fuel volume obligations, we ask that you maintain the proposed conventional fuel requirement of 15 billion gallons and utilize a forward-looking methodology for a more robust requirement for cellulosic and advanced biofuel volumes.

Minnesota and America’s corn farmers will continue to work closely with state and national partners to achieve the RFS goals of increased energy security, cleaner air and consumer choice.

Sincerely,

Harold Wolle, Jr.
President
Minnesota Corn Growers Association