October 26, 2018

Acting Administrator Andrew Wheeler  Deputy Administrator Heidi King
Environmental Protection Agency  Natl. Highway Transportation Safety Admin.
1200 Pennsylvania Ave. NW  1200 New Jersey Ave. SE
Washington, DC 20460  Washington, DC 20590


Dear Acting Administrator Wheeler,

The Minnesota Corn Growers Association (MCGA) appreciates the opportunity to provide comments on behalf of more than 6,500 farmer members on the proposed SAFE Vehicles Rule.

Minnesota corn farmers are proud of our efforts to provide a feedstock source for ethanol production and the work we have done with state and national partners to provide funding for ethanol infrastructure projects all across Minnesota to improve consumer access to higher ethanol blends.

MCGA and our members have a strong vested interest in the future of transportation fuels. Ethanol is an affordable, readily available, low-carbon and cleaner-burning source of octane. Octane is an essential tool for automakers to meet future emissions and efficiency standards while also providing a cost-effective and safe option for consumers.

Automakers have been able to make efficiency gains through technology changes. We urge you to consider fuels and vehicles as a system of high-octane fuel used with optimized engines.

MCGA has included detailed comments submitted separately by the National Corn Growers Association (NCGA) as a part of this rulemaking, which we fully support and ask you to consider. The detailed NCGA comments show the benefits for fuel economy and emissions reductions from the use of high-octane fuels in vehicles with optimized engines.

Continuous improvement in corn ethanol production has resulted in a smaller carbon footprint and currently corn ethanol is the lowest cost and lowest carbon octane source available.

MCGA supports one national standard for vehicles. High-octane, low-carbon fuel can help harmonize federal and state standards and is a needed compromise solution for future standards. Thank you for reviewing and considering our comments and the detailed comments from NCGA.

Sincerely,

Brian Thalmann
President
Minnesota Corn Growers Association