On behalf of the Minnesota Corn Growers Association and its nearly 7,000 corn farmer-members we appreciate the opportunity to provide testimony on the Renewable Fuel Standard.

My name is Richard Syverson, a farmer from Clontarf, Minnesota. I currently serve as the President of the Minnesota Corn Growers Association. In addition to farming in Western Minnesota with my family, I am a shareholder in the Chippewa Valley Ethanol Company in Benson, Minnesota, a 50 million gallon per year ethanol plant.

Since the RFS became law, America's corn farmers have stepped up to the plate to help ensure the law is successful. A successfully implemented RFS provides certainty in agriculture markets, reduces air emissions and lowers fuel prices for consumers.

When the RFS was first enacted in 2005, expanding the fuel supply, improving energy security, lowering fuel prices for consumers and reducing emissions were primary drivers and are still relevant today, maybe even more so.

Corn farmers provide the primary feedstock for low carbon ethanol and corn farmers contribute to the success of the RFS through higher corn yields and continuous improvement in sustainable feedstock production.

Corn farmers help to deliver a product that has lower air emissions and prices for consumers and expands our fuel supply all while still providing enough sustainably produced corn for broader food, feed and export needs.

We are moving into a new phase of RFS implementation, and generally we appreciate EPA's forward-looking proposal of annual increases in renewable fuel volumes, including an implied conventional biofuel volume of 15.25 billion gallons.

We support the growth trajectory in EPA's proposal. But biofuels can do even more to help increase energy security and reduce costs for consumers while providing environmental benefits. We ask EPA to continue to work with us on complementary policies that advance higher ethanol blends which will help to reduce fuel costs as well as air emissions.

There is one change in RFS administration that is very important to corn farmers. We urge EPA to simply adopt the U.S. Department of Energy's Argonne National Lab GREET model for lifecycle GHG assessment. EPA has acknowledged that the current modeling framework is old and needs updating. Argonne GREET is already updated and reflects modern biofuel production processes. Today's ethanol production cuts carbon emissions by 50 percent compared to gasoline. We

strongly urge EPA to adopt this model instead of relying on outdated estimates and proposing more modeling reviews.

Corn farmers stand ready to work with EPA to offer immediate and affordable emission reductions via the use of low carbon ethanol in our transportation fuel supply.