

**EPA Public Hearing  
Wednesday, July 31, 2019  
Mr. John Linder,  
National Corn Growers Association**

I appreciate the opportunity to share the views of the National Corn Growers Association.

My name is John Linder, and I serve on NCGA's Board. Along with my wife Cheryl and brother Mike, I raise corn, soybeans and wheat on our family farm near Edison, Ohio.

Ethanol production adds value to our entire corn crop through in-state markets. Every bushel we produce provides feed for livestock, whether as coarse grain or processed distillers grain, the co-product of ethanol. Ethanol supports this value chain, an economic tide that lifts all ships.

Farmers across the Corn Belt this spring experienced significant flooding that delayed or prevented planting. In my 39 years of farming, this is the first time I have not been able to plant all my intended crop acres, reducing my ability to generate revenue from the start. This comes on the heels of consecutive years of low prices that cut net farm income in half between 2013 and 2018.

Amid these challenges, farmers continue to be concerned with EPA actions that undermine the RFS. This proposed rule allows retroactive refinery exemptions to continue to destroy renewable fuel demand. In addition, the proposal ignores the D.C. Circuit Court's finding that EPA improperly waived 500 million gallons in 2016.

For 2020, EPA proposes to increase total renewable fuel blending by 120 million gallons and maintain an implied conventional ethanol requirement of 15 billion gallons.

These volumes are meaningless amid EPA's massive expansion of retroactive refinery waivers. Farmers have no confidence EPA will ensure these volumes are met – which the law requires.

EPA has already waived 2.61 billion ethanol-equivalent gallons and has an additional 38 waivers pending, which cover nearly 10 percent of the RFS.

The proposal states that comments regarding accounting for refinery exemptions will not be considered. Our views deserve to be heard, and EPA must account for waived gallons to keep the RFS whole.

Last year, EPA stated the agency would address the D.C. Circuit Court's remand of the 2016 RVO in a future rulemaking, but this year, EPA proposes the agency take no action.

NCGA urges EPA to restore the 500 million gallons improperly waived in the final rule. The RFS requires EPA to set high standards in order to push demand up.

Compared to gasoline, ethanol results in 40 percent fewer greenhouse gas emissions, replaces the most toxic fuel components and costs much less. To date, waivers reduced ethanol consumption and the ethanol blend rate in 2018 for the first time and are reducing demand for corn for ethanol production.

NCGA asks EPA to account for waivers to keep the RFS whole, restore the 500 million gallons and move forward with a stronger RFS that supports America's farmers, our rural communities and consumers.

Thank you.