

**EPA Public Hearing
March 29, 2019**

The National Corn Growers Association appreciates EPA moving forward with a proposed rule to remove an outdated regulatory barrier and allow for year-round sales of E15 across the country.

My name is Kevin Ross. I am a sixth-generation farmer from Minden, Iowa, where my wife Sara and I grow corn, soybeans and alfalfa, as well as raise cattle. I am also the First Vice President of NCGA.

Continued low commodity prices and consecutive years of declining farm income, coupled with recent trade disruptions and EPA's expansive RFS waivers for refineries, are taking a toll on farmers.

While year-round E15 cannot offset the harm from refinery waivers, higher blends of ethanol are a no-cost means to grow demand. Treating 15 percent ethanol blends, or E15, the same as standard 10 percent ethanol blends will expand a domestic market for farmers -- as well as benefit both drivers and our environment.

E15 can save drivers between 3 and 10 cents per gallon. Since more than 90 percent of vehicles on the road today can use E15, more retailers will be able to offer consumers more choice when this outdated restriction is lifted.

Blending more ethanol through E15 reduces greenhouse gas emissions. E15 also has lower volatility than E10 – controlling fuel volatility is why EPA regulates Reid Vapor Pressure. This regulatory change just makes sense.

NCGA agrees with EPA's proposal to update interpretations of the Clean Air Act. Prior interpretations were made long before EPA approved E15 in 2011 and before EPA updated the vehicle certification fuel. These major changes make it imperative that EPA revisit how E15 is treated.

Specifically, NCGA urges EPA to adopt the proposed interpretive rulemaking that finds E15 is "substantially similar" to the current E10 certification fuel. This interpretation makes the rule stronger.

To ensure E15 sales are not interrupted, NCGA urges EPA to complete this rulemaking by June 1, as well as keep the complex RIN market reform proposal from weighing down the E15 rule.

While farmers are not direct participants in the RIN market, we know an effective RIN market helps drive biofuels blending under the Renewable Fuel Standard, and we are concerned with some of the proposals. EPA must ensure RIN market rules are fair to those who are blending biofuels to further the RFS and maintain an efficient RIN marketplace.

Farmers stand ready to work with the Administration to clear obstacles to higher blends of ethanol such as E15 and ensure a final rule works for the full ethanol and fuel supply chain. Thank you for moving forward with this overdue regulatory relief that benefits farmers, drivers and our environment.