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**USEPA Renewable Fuel Standard Program: Standards for 2020 and Biomass-Based Diesel Volume for 2021, and Response to the Remand of the 2016 Standards
Docket ID No. EPA-HQ-OAR-2019-0136
Lucas Crumley, Ohio Corn and Wheat Growers Association
October 30th, 2019**

Thank you, Administrator Wheeler, for this opportunity to offer comment on the agency's proposed rule for 2020 Renewable Fuel Standards (RFS). On behalf of the more than 1,800 members of the Ohio Corn & Wheat Growers Association, I write to you today in strong opposition to the agency's proposed rule.

In establishing the Renewable Fuel Standard, Congress demonstrated a clear and undeniable intent to increase the use of biofuels. Through executing that legislative intent, the RFS has provided security to the nation's fuel supply and reduced dependency on foreign oil – contributing to stable markets that protect American consumers. The agency, through its recent and unprecedented volume of small refinery waivers, has undercut that legislative intent. The proposed rule we discuss today falls far short of making the RFS whole in 2020 and creates a market of uncertainty for the future.

Across Ohio, nearly forty percent of all corn enters the production chain for ethanol. The actual gallons waived by EPA in 2019 have crippled production in Ohio, leading to plant slow-downs and the indefinite closure of one of our seven ethanol plants responsible for nearly 10% of our state's ethanol production. Ohio's corn farmers now face diminishing demand in the midst of a difficult growing season and a destructive trade war. The 1.3 billion waived gallons allowed by the EPA in 2019, are wreaking havoc on Ohio's agricultural economy.

Aside from the economic impact of this short-sighted proposal, refusing to grow the demand of biofuels will throw away years of positive environmental impact fostered by the RFS. Ethanol blended gasoline reduces carbon-dioxide emissions by forty million metric tons per year, equivalent to removing 8.4 million cars from the road. By ignoring the critical role RFS plays in protecting our environment, EPA is abandoning its core mission to protect human health and the environment.

The record on ethanol in America is clear: it has boosted farm income, created jobs, diversified and protected our nation's fuel supply, and cleaned the air we breathe. If we are to continue this incredible progress, EPA must answer for the waivers it has granted capriciously in 2019 and enforce the law as Congress intended moving forward.

Ohio Corn and Wheat Growers Association asks the EPA to account for all actual gallons waived in 2019 under small refinery exemptions and fully restore the RFS. We believe this is the only path forward to restoring faith in the agency's ability to administer the RFS and uphold the law.

