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America's Ethanol Supporters

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RE: Docket No. USDA-2020-0003
U.S. Department of Agriculture
Deputy Secretary Stephen Censky
1400 Independence Avenue SW
Washington, DC 20250

Dear Deputy Secretary Censky:

Thank you for the opportunity to submit comments to the U.S. Department of Agriculture (USDA) regarding breakthroughs that enable our domestic agriculture sector to increase production while cutting its environmental footprint. The biofuels industry and the farmers that provide its feedstocks stand ready to partner with USDA in achieving the agency's goals.

Growth Energy is the world's largest association of ethanol producers, representing nearly half of the nation's ethanol production and thousands of supporters across the country. Our ethanol producers work to bring consumers better choices at the fuel pump, grow America's economy, and improve the environment for future generations. Last year, our industry purchased 5.33 billion bushels of corn to produce nearly 16 billion gallons of biofuels and more than 42 million tons of dried distiller grains[1]. In 2018, 36.8% of field corn went into fuel ethanol and served as the second-largest customer for U.S. corn[2]. Accordingly, we have a strong interest in the future success of American agriculture.

Environmental Benefits
Incorporating biofuels into our nation's fuel supply has been one of our most successful energy policies to date, benefitting both the environment and the consumer. With many states and localities increasingly exploring public policy options to lower carbon emissions, biofuels have become an affordable and accessible solution for many. Studies show that biofuels can immediately contribute to lowering greenhouse gas (GHG) emissions and reduce harmful air toxics. In fact, USDA[3] found that ethanol reduces GHGs by 39% compared to traditional

[1] "Grain Crushings and Co-Products Production 2019 Summary," U.S. Department of Agriculture, National Agricultural Statistics Service. March 2020, https://www.nass.usda.gov/Publications/Todays_Reports/reports/cagcan20.pdf.
[2] "Corn Used for Ethanol and DDG Production: 1989-2019," World of Corn. January 2020, http://worldofcorn.com/#corn-used-of-ethanol-and-ddg-production.
[3] "The greenhouse gas benefits of corn ethanol—assessing recent evidence," *Biofuels*. Jan Lewandrowski, Jeffrey Rosenfeld, Diana Pape, Tommy Hendrickson, Kirsten Jaglo, Katrin Moffroid (2020). 11:3, 361-375, DOI: 10.1080/17597269.2018.1546488.

gasoline, and by 2022, the agency anticipates corn ethanol's relative carbon benefits could reach up to 70%.

Additionally, biofuels are responsible for nearly 80 percent of all carbon reductions credited under California's Low Carbon Fuel Standard[4] (LCFS), with the recorded carbon intensity of ethanol declining nearly 33 percent since 2011. And with an increasing emphasis on higher ethanol blends like E15 and beyond, we can ensure the next generation of fuel standards will deliver benefits for both our climate and human health.

As policymakers and public health experts dig deeper into the human costs of air pollution, including heightened risk from COVID-19 among vulnerable communities, a rapidly growing body of research[5] is raising awareness of the threat posed by these toxic fuel additives, including benzene, toluene, ethylbenzene, and xylene (BTEX).

Motor fuels contain a variety of petrochemicals, each with their own characteristics and hazards. Currently, aromatics and carbon compounds make up 19.3 percent of unleaded gasoline that comes out of the pump, according to the Environmental Protection Agency[6] (EPA). These petroleum-based aromatic compounds – such as BTEX – play a dominant role in the formation of toxic emissions linked to cancer, as well as neurological, cardiovascular, and reproductive damage. According to the World Health Organization[7], an estimated 4.2 million premature deaths globally are linked to air pollution, marking it as one of the world's top killers.

Fortunately, we have a better option in ethanol, the single most affordable and abundant alternative to petroleum-based fuel additives that threaten air quality in communities across the globe. To expand on these benefits, USDA should continue to promote programs that boost the use and access to biofuels throughout the country.

Higher Blends Infrastructure Incentive Program

Programs such as the Renewable Fuel Standard, as well as the continued expansion of access to higher biofuel blends like E15, E30, and E85, can build on biofuels' environmental progress and expand the market for American agriculture. USDA's Higher Blends Infrastructure Incentive Program (HBIIP) is a prime example how the agency can support the productivity of our farmers, while decreasing GHG emissions and encouraging the further adoption of sustainable farming practices across our agriculture sector. HBIIP aims to increase market access for higher blends of ethanol by investing in infrastructure improvements at retail gas stations across the country. With approximately 93% of registered vehicles approved by the EPA to use E15, there is a significant market available today for higher blends if consumers can access these products.

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[4] "Data Dashboard: Low Carbon Fuel Standard," California Air Resources Board. May 2020, https://ww3.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm.

[5] "Biofuels: Key to Clean, Healthy Air," Growth Energy. July 2020, https://growthenergy.org/wp-content/uploads/2020/05/GROW-20087-Issue-Brief-Air-Quality-2020-05-29-R3.pdf

[6] "Fuel Trends Report: 2006-2016," U.S. Environmental Protection Agency. October 2017, https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100T5J6.pdf.

[7] "Ambient Air Pollution: Health Impacts," World Health Organization. July 2020, https://www.who.int/airpollution/ambient/health-impacts/en/.

Long-term commitments to programs like HBIIP are crucial for expanding retail access to higher blends of biofuels.

We strongly support USDA's commitment towards higher blend rates, as outlined in the agency's February 2020 report, to E15 by 2030 and E30 by 2050[8]. The biofuels industry is ready to provide the fuel necessary to meet those goals; however, long-term infrastructure incentives for our retailers, like the competitive grant structure under HBIIP, must be available. In past iterations of HBIIP, demand for the grants exceeded funds available, demonstrating that retailers – and the consumers they serve – want a lower cost fuel and more choices at the pump. This gives them a competitive advantage in the market while giving our transportation sector a higher quality fuel that decreases GHG emissions and displaces toxic fuel additives.

Innovations in Agriculture

The environmental benefits of biofuels are intensified when coupled with innovations in precision agriculture, which would fall under USDA's *Digital/Automation* cluster. America's farmers are producing more food and energy than ever before and using less cropland to do it. Over the past 50 years, total cropland has fallen by 16.7 percent: in 1978, the United States used 470.8 million acres of cropland, and by 2012, total cropland decreased to 391.9 million acres[9]. Through sustainable farming practices, American agriculture has also decreased the volume of water used for irrigating each acre of corn, producing record harvests without the need for more fertilizer or pesticide.

We urge USDA to continue to explore the strong link between U.S. agriculture and our biofuels industry, and promote the increased use of biofuels so our nation's farmers can continue to rely on these markets now and in the years ahead. We are grateful for your consideration of these comments and look forward to working with the department to advance these important initiatives.

Sincerely,

Emily Skor
CEO
Growth Energy

[8] "Innovation Agenda," U.S. Department of Agriculture. February 2020, https://www.usda.gov/sites/default/files/documents/agriculture-innovation-agenda-vision-statement.pdf

[9] "Cropland, 1945-2012, by State: The sum of cropland used for crops, cropland idled, and cropland used for pasture," U.S. Department of Agriculture's Economic Research Service. August 2017, https://www.ers.usda.gov/data-products/major-land-uses/