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GrowthEnergy.org

March 11, 2021

Michael Regan
Administrator
U.S. Environmental Protection Agency
1300 Pennsylvania Avenue
Washington, DC 20460
Docket ID No. EPA-HQ-OAR-2020-0448
Submitted through <http://regulations.gov>

Dear Administrator Regan:

Growth Energy is the nation's largest renewable fuel organization representing 89 biofuel producers, nearly 100 associated businesses in the biofuel supply chain, and tens of thousands of biofuel supporters across the country. We believe expanding our nation's fuel mix with more biofuel will continue to lower costs for consumers, revitalize our rural economy, and improve our environment.

The Renewable Fuel Standard (RFS) has and continues to be one of our nation's most successful transportation decarbonization policies. The rapid investment and development of biofuels have reduced greenhouse gas emissions by decreasing our dangerous dependence on foreign oil. Plant-based ethanol blends now represent 98 percent of the fuel used on America's roads today. Biofuels have saved consumers billions of dollars and have reduced harmful air toxics like carbon monoxide and soot, and we are poised to do much, much more with higher blends like E15, E85, and E30.

The intent of the RFS is to blend more biofuels into our nation's transportation fuel supply. Period. It is not meant to have oil companies use questionable legal tactics to avoid blending biofuels and then demand that the agency further delay compliance. From 2016 until 2020, the Trump EPA granted an unprecedented 88 small refinery exemptions costing the biofuels industry more than 4.4 billion gallons of lost demand. The impact of these exemptions has continued to pile on the uncertainty and difficulty faced by farm families and biofuel workers are facing on top of trying to make a living in a global pandemic.

With recent research showing that greenhouse gas emissions from corn ethanol are 46 percent lower than gasoline, it makes no sense why EPA should continue to exempt oil companies and further delay them from complying with their blending obligations. Instead, we hope this administration will take immediate steps to restore integrity to the RFS, restore lost biofuel demand, and remove remaining hurdles to E15 and higher biofuel blends.

Specifically, we call on EPA to reject calls to delay RFS compliance and take immediate steps to narrow its use of small refinery exemptions and apply the decision of the 10th Circuit Court nationally moving forward.

EPA should also immediately move to finalize the renewable volume obligation for 2021 and restore the 500 million gallons remanded by the courts in 2017.

With more than 95 percent of the vehicle fleet approved for use with E15, the agency should finalize its proposal to fix the onerous labeling requirement for E15, and further clarify that all existing storage and dispensing equipment in use with E10 blended gasoline is appropriate for use with E15.

EPA should also move to approve pending applications for the production of cellulosic biofuel from kernel fiber.

Further, EPA should update its lifecycle emissions modeling that continue to show ethanol's further improvements in greenhouse gas reduction and should set forward leaning biofuel targets for 2023 and beyond.

Finally, EPA should seek ways to use low-carbon, high octane fuels like ethanol to further decarbonize our nation's transportation fleet.

Thank you in advance for your consideration and please let us know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christopher P. Bliley".

Christopher P. Bliley
Senior Vice President of Regulatory Affairs
Growth Energy

CC: Dan Utech, Chief of Staff
Joe Goffman, Office of Air and Radiation