



January 23, 2014

The Honorable Gina McCarthy
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Ariel Rios Building
Washington, DC 20460

Air and Radiation Docket and Information Center
Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Ave, NW
Washington, DC 20460

Re: Docket ID No. EQP-HQ-OAR-2013-0479

Dear Administrator McCarthy:

The National Association of Wheat Growers (NAWG) appreciates the opportunity to provide comments on the Environmental Protection Agency's (EPA) proposed 2014 Standards for the Renewable Fuel Standard (RFS) Program. NAWG is a federation of 22 state wheat grower associations that works to represent the needs and interests of wheat producers before Congress and federal agencies. Based in Washington, D.C., NAWG is grower-governed and grower-funded, and works in areas as diverse as federal farm policy, trade, environmental regulation, agricultural research and sustainability.

The RFS has reduced greenhouse gas emissions, increased production of domestic renewable energy and energy security, and encourage economic development and new technology. NAWG supports the Renewable Fuels Standard as passed by Congress and opposes EPA's proposed 2014 Renewable Volume Obligation (RVO) under the RFS. Changes to the RFS would send the wrong market signals, impacting agricultural markets and investments in new technology and cellulosic biofuels production.

The RFS strengthened the domestic renewable fuels industry; supports jobs in rural America, strengthens the agriculture economy and is advancing new technology. As the agriculture industry looks to provide food and fuel to a growing population and an estimated 9 billion people by 2050, new technology and innovation for production and utilization of crops must be encouraged and supported. Wheat farmers have diversified farming operations and the impact of EPA's proposed changes will be felt across all agricultural operations. Most wheat farmers make planting and marketing decisions well in advance of the crop, and the proposed changes will impact all commodity markets by changing the expected corn utilization in 2014.

NAWG supports the RFS and other programs that will spur production of renewable fuels utilizing biomass, such as wheat straw and other agricultural by-products. The future of cellulosic ethanol holds many benefits for consumers and producers. Advancing cellulosic ethanol would be a win-win situation in which new business opportunities arise and consumer benefits grow. The RFS is important to continued investment in the development of cellulosic biofuels technologies and commercialization and changes to the RFS would hinder the progress toward cellulosic ethanol production. The development of new technologies and commercialization of cellulosic ethanol has not been as rapid as we hoped, but a strong commitment to the RFS must be maintained.

Altering the RFS would have a devastating impact on future investments in the next generation of biofuels. This would leave our energy policy stranded in the last century and serves as a reckless policy approach with national security implications. Future investments in biofuels could potentially decline because of changes in the RVO and indications that the RFS is not a priority and a consistent requirement, making investors wary to extensive resources. If we are to move to second or third generation biofuels, it is imperative the RFS stays in place to protect those who are doing the research now on advanced technologies and alternative feedstocks. NAWG acknowledges that policy consistency is imperative for enabling investors to feel confident that they will make a return on investments within the ethanol and cellulose fields.

The proposed 2014 RVO changes will adversely impact rural economies due to the reduction in renewable fuel production and impact on associated jobs. With the majority of biofuels facilities are located in Rural America where the impacts of changes to the RFS will be felt directly by biorefinery employees and local rural and agricultural businesses. In 2012, the RFS supported more than 300,000 jobs, contributing \$43.4 billion to the national Gross Domestic Product (GDP) and adding \$30.2 billion to household income (source: RFA).

The RFS has resulted in positive impacts on the environment reducing greenhouse gas emissions by 33.4 million tons in 2012. EPA's own estimates are that by 2022, the RFS will reduce greenhouse gas emissions by 138 million metric tons or the equivalent of taking 27 million passenger vehicles off the road.

EPA must address the “so-called” blend wall by fully taking into consideration the expanding use of E15 expanding with the EPA’s approval of the use of E15 in model year 2001 and newer cars, light-duty trucks, medium-duty passenger vehicles (SUVs) which includes more than 60% of those cars on the road today. The growth of biodiesel production should also be fully calculated into EPA’s volume requirements.

The RFS has resulted in a stronger domestic renewable fuels portfolio and a consistent commitment to the RFS is essential to providing the stability need to attract robust investment in biomass production research and cellulosic ethanol commercialization. We ask that the EPA thoroughly review the proposed 2014 RVO requirements and maintain the RFS as passed by Congress.

Sincerely,

A handwritten signature in black ink that reads "Bing Von Bergen". The signature is written in a cursive, flowing style.

Bing Von Bergen
President
National Association of Wheat Growers