

EPA Public Hearing  
October 30, 2019  
Mr. Jim Greif  
Iowa Corn Growers Association

Hello, my name is Jim Greif and I am an Iowa corn farmer from Monticello, Iowa, and I currently serve as the President of Iowa Corn Growers Association. I'm also a farmer who is suffering from demand destruction at the hands of the EPA due to small refinery waivers. The proposed rule is **not** what was promised to farmers, biofuel producers, and our lawmakers a mere 11 days prior to the rule's release.

The language in this proposal is a trick, not a treat. Instead of restoring biofuel demand based on the number of gallons impacted, the agency now wants to rely on Department of Energy recommendations that EPA has historically **not** followed. This detail matters. To put it in perspective, the initial agreement reached on October 4 would restore 1.35 billion gallons of biofuel demand in 2020. This amount is based on a 3-year average of gallons **actually** waived. However, the EPA's proposal using DOE recommendations would only restore 770 million gallons. By following DOE suggestions, rather than actual numbers, farmers may only get back **half** of the demand destruction that EPA actually grants in future years.

This means 580 million gallons of biofuel demand will be waived annually that is completely unaccounted for – roughly eliminating the ethanol production capacity of the entire state of Wisconsin.

In corn numbers, this means 203 million bushels of corn demand will continue to be eliminated annually – that's like eliminating all of the corn acres in the entire state of Colorado.

On my farm, this proposal is devastating. Not only am I impacted, but this will hurt all the corn farmers in the state of Iowa, and we have enough problems piled on us with low prices, wet weather and the ongoing trade disputes. The weather cannot be controlled but our own government should be able to step up when called upon. Right now, the trust factor with EPA is at an all-time low and fixing this rule as requested by Iowa Corn could help this trust to be restored.

I will end by saying the solution is simple. EPA must follow the law. Ensure that any reallocation of small refinery exemptions is based on actual gallons waived through the program as the law was intended, and not based on DOE recommendations that the EPA itself consistently chooses to ignore. Please, follow the RFS as Congress intended

and uphold the October 4 agreement. A deal is a deal. The law is the law. Make it right.

Thank you.