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GrowthEnergy.org

October 28, 2020

RE: Docket No. USDA-2020-0008

U.S. Department of Agriculture
Secretary Sonny Perdue
1400 Independence Avenue SW
Washington, DC 20250

Dear Secretary Perdue:

Thank you for the opportunity to submit comments to the U.S. Department of Agriculture (USDA) regarding readily available technologies that enable our domestic agriculture sector to increase production while cutting its environmental footprint. The biofuels industry stands ready to partner with USDA in achieving these goals.

Growth Energy is the world's largest association of biofuel producers representing 89 U.S. plants that produce more than 7.5 billion gallons of cleaner-burning, renewable fuel annually, 96 businesses associated with the production process, and tens of thousands of biofuel supporters across the country. Together, we are working to bring better and more affordable choices at the fuel pump, improve air quality, and protect the environment for future generations. Last year, the ethanol industry purchased 5.33 billion bushels of corn to produce nearly 16 billion gallons of biofuels and more than 42 million tons of dried distillers grains¹. Also in 2019, 29.5% of field corn went into fuel ethanol and served as the second-largest customer for U.S. corn². Accordingly, we have a strong interest in the future success of American agriculture.

We strongly agree with the goals established in USDA's Agriculture Innovation Agenda. In particular, achieving market-driven biofuel blend rates of 15% in transportation fuels by 2030 and 30% by 2050, and enhancing carbon capture technologies. Our producers stand ready to help USDA meet these goals.

Investing in Biofuels Infrastructure

Supporting programs like the Renewable Fuel Standard and initiatives to expand access to higher biofuel blends like E15, E30, and E85 can build on biofuels' environmental progress and expand

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 Usage by Segment 2019," National Corn Growers Association. October 2020.

<http://worldofcorn.com/#corn-usage-by-segment>

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 greenhouse gas (GHG) emissions and encouraging further adoption of sustainable farming practices across our agriculture sector. In fact, just a few weeks ago, Growth Energy’s unmatched network of both large and small retail partners secured nearly \$30 million from USDA’s HBIIP program for over 290 sites selling more than 400 million gallons of gasoline annually. The public and private investments we have seen through HBIIP allows retailers to continue upgrading infrastructure for higher blends of ethanol and expand consumer access to this cleaner-burning, more affordable fuel across the country.

With more than 95% of cars on the road compatible with E15, there is a significant market available today for higher blends of biofuels if consumers can widely access these products. The biofuels industry is ready to provide the fuel necessary to meet those demands; 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 retailers a competitive advantage in the market while providing our transportation sector a higher quality fuel that decreases GHG emissions and displaces toxic fuel additives.

Biofuels are Key to Cleaner, Healthier Air

Incorporating biofuels into our nation’s fuel supply has been one of our most successful energy policies to date, benefitting both the environment and 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 GHG emissions and reduce harmful air toxics. In fact, USDA found that ethanol reduces GHGs by 39% compared to traditional gasoline, and by 2022, the agency anticipates that corn ethanol’s relative carbon benefits could reach up to 70%³.

Additionally, biofuels are responsible for nearly 80% of all carbon reductions credited under California’s Low Carbon Fuel Standard (LCFS), with the recorded carbon intensity of ethanol declining 33% since 2011⁴. 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 is raising awareness of the threat posed by toxic fuel additives including benzene, toluene, ethylbenzene, and xylene (BTEX)⁵.

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](https://doi.org/10.1080/17597269.2018.1546488).

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>

Motor fuels contain a variety of petrochemicals, each with their own characteristics and hazards. Currently, aromatics and carbon compounds make up 19.3% of unleaded gasoline that comes out of the pump, according to the Environmental Protection Agency (EPA)⁶. 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, an estimated 4.2 million premature deaths globally are linked to air pollution, making it one of the world’s top killers⁷.

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 biofuels access and use throughout the country.

Ethanol’s Advancement in Carbon Capture

Approximately fifty U.S. ethanol plants already capture, clean, and condense 99%-pure carbon dioxide. According to Christianson PLLP’s Biofuels Benchmarking program, those plants capturing carbon dioxide do so at an average rate of 1,980 tons of carbon dioxide per million gallons of ethanol produced, with the top 25% capturing 3,075 tons of carbon dioxide per million gallons of ethanol produced. This means an average-sized ethanol plant captures between 99,000 to 153,000 tons of carbon dioxide each year. With a nationwide fleet of more than 200 ethanol plants, there is room to significantly expand these benefits.

Carbon dioxide captured by ethanol plants has a wide array of uses as a water treatment measure by municipalities, preservative for commercial food and beverage companies, and injection for enhanced oil recovery efforts. It can also be permanently sequestered through appropriate geological storage sites. Our facilities capture and transport carbon dioxide directly to customers, significantly dropping the net amount of carbon dioxide that would be emitted into the air or drilled out of the ground.

As USDA continues to develop benchmarks to improve environmental accountability, we encourage the agency to incorporate carbon dioxide savings realized by a quarter of the nation’s ethanol facilities as a contributing factor towards cutting agriculture’s environmental impact.

Innovations in Agriculture

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%: in 1978, the United States used 470.8 million acres of cropland, and by 2012, total cropland decreased to 391.9 million acres⁸. 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.

⁶ “Fuel Trends Report: 2006-2016,” U.S. Environmental Protection Agency. October 2017, <https://nepis.epa.gov/Exe/ZyPDF.cgi?DockKey=P100T5J6.pdf>.

⁷ “Ambient Air Pollution: Health Impacts,” World Health Organization. July 2020, <https://www.who.int/airpollution/ambient/health-impacts/en/>.

⁸ “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/>

We urge USDA to continue exploring 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 as we work to reduce the environmental impact of the agriculture sector. We are grateful for your consideration of these comments and look forward to working with the department to advance these important initiatives.

Sincerely,

A handwritten signature in blue ink, appearing to read "Emily Skor", is centered below the text "Sincerely,". The signature is written in a cursive, flowing style.

Emily Skor
CEO
Growth Energy