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January 28, 2014

The Honorable Gina McCarthy, Administrator
U.S. Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Ave NW
Washington, DC 20460

Docket ID: EPA-HQ-OAR-2013-0479
RE: 2014 Standards for the Renewable Fuel Standard Program

Dear Administrator McCarthy:

On behalf of the members of Iowa Farmers Union (IFU), thank you for accepting our written comments regarding the 2014 standards for the federal Renewable Fuel Standard (RFS) program. IFU is deeply concerned with the proposal by the Environmental Protection Agency (EPA) to reduce targets for renewable biofuels, conventional biofuels and advanced biofuels. We request that the EPA return targets for all categories of biofuels to those originally established by the RFS statute.

The biofuels industry plays a vital role in the financial success of Iowa farmers and has created thousands of jobs and brought millions of dollars of investment to Iowa's rural communities. As with any developing industry, the success of the biofuels industry depends in large measure on stability and predictability in the marketplace. In the short term, the EPA proposal to reduce RFS targets has driven down commodity prices for our farmers. In the longer term, it will result in the loss of investment and jobs for Iowa's rural communities and halt progress toward sustainable and domestically produced renewable energy.

IFU represents a diverse mix of farmers. Our conventional corn and soybean growers have reaped significant benefits from the progress already achieved through the federal RFS. We also represent many farmers who are exploring more diversified and sustainable cropping systems, including perennial cropping systems, that would play a key role in the next generation of advanced biofuels. This is precisely the progress contemplated by the RFS statute, but it will not happen on the scale necessary for success if farmers and biofuels processors lack a stable and predictable market to guide decision making.

The actions proposed by the EPA would halt the progress of the RFS only part of the way through the timeline set out in the RFS statute. The investments already made by our farmers and rural communities deserve to be honored, and the RFS targets should remain as set forth in the statute.

Thank you for your consideration of these comments.

Sincerely,

Jana Linderman
President

Since 1915, Iowa Farmers Union members have worked together to strengthen the independent family farm through education, legislation and cooperation and to provide Iowans with sustainable production, safe food, a clean environment and healthy communities.

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