August 8th, 2025

The Honorable Lee Zeldin, Administrator
Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Docket No. EPA-HQ-OAR-2024-0506

Dear Administrator Zeldin:

On behalf of more than 40,000 dues-paying corn farmers and more than 500,000 growers who contribute to corn checkoff programs nationwide, the National Corn Growers Association (NCGA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed Renewable Fuel Standard (RFS) volumes for 2026 and 2027.

We commend the Agency for its proposal to maintain the implied conventional renewable fuel requirement at 15 billion gallons for both 2026 and 2027. These volume levels send a strong signal to corn growers across the country that EPA recognizes the maturation of the ethanol industry and its contributions to American energy dominance. They also set an achievable benchmark for the industry. U.S ethanol consumption rose to 14.26 billion in 2024, and is set to surpass that number in 2025.

A dependable RFS is essential to unleashing America's domestic energy strength. For nearly two decades, ethanol has helped expand our nation's fuel supply, reduce dependence on foreign energy sources, and support American jobs across sectors.

The 15-billion-gallon measure provides the certainty that markets need to function efficiently. Corn farmers are making long-term decisions about planting, investing in equipment, and adopting precision technologies that improve productivity and sustainability. A strong RFS allows those decisions to be made with confidence, ensuring stable corn prices, growing rural economies, and the continued viability of family farms across the country.

America's corn farmers have stepped up. Today, they grow more corn on fewer acres and with fewer inputs than ever before thanks to innovation, stewardship, and commitment to constant progress. In order to best recognize this progress, we encourage EPA to adopt the Department of Energy's GREET model to encapsulate the greenhouse gas emissions benefits of corn and corn-based ethanol. Ethanol made from this corn remains one of the most cost-effective and scalable tools for reducing transportation emissions and prices at the pump.

Additionally, NCGA supports EPA's prioritization of domestically sourced ethanol and its feedstock in this proposal. NCGA appreciates the Administration's clear focus to level the playing field for American farmers in the liquid fuels space, however, recent legislative actions that also prioritize North American feedstocks could have added a layer of complexity that merits the agency's

consideration. NCGA would be in favor of a commonsense approach that serves the interests of American farmers and also ensures stability in the fuel supply.

In this proposal, EPA makes a much-needed course correction on the matter of eRINS. The final "Set 1" rule would have authorized electric vehicle manufacturers to generate eRINs. In NCGA's estimation this action was antithetical to the fundamental intent of the RFS and that RINs should be generated strictly for the direct use of transportation fuels.

Finally, timely volume-setting is not just a matter of regulation, it's a matter of predictability for rural communities. Congress established the RFS to grow renewable fuel use, and by law, volumes must be finalized with adequate lead time. EPA's action in proposing 2026 and 2027 volumes on schedule is welcome news that brings clarity to a sector that has often faced unnecessary uncertainty.

NCGA would like to encourage the agency to finalize the implied conventional renewable fuel requirement at 15 billion gallons for 2026 and 2027, as proposed. An RFS, built on certain and transparent rulemaking emboldens the strength of rural America and the agriculture industry. This action will help drive energy dominance and maintain an extremely valuable market for American farmers.

Thank you for your leadership and for the opportunity to provide comments.

Sincerely,

Kenneth Hartman Jr.

President

National Corn Growers Association

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