

# AMERICAN SEED TRADE ASSOCIATION



January 28, 2014

Air and Radiation Docket and Information Center  
Environmental Protection Agency  
Mail Code: 2822T  
1200 Pennsylvania Ave. N.W.  
Washington, DC 20460

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

Dear Sir or Madam:

The American Seed Trade Association (ASTA) appreciates the opportunity to comment on the recent proposed rule for the 2014 Standards for the Renewable Fuel Standard Program (RFS) which would significantly reduce the requirements under the Renewable Fuel Standard. Founded in 1883, ASTA is one of the oldest trade organizations in the United States. Our membership consists of over 700 companies involved in seed production and distribution, plant breeding and related industries in North America. ASTA promotes the development of better seed to produce better crops for a better quality of life.

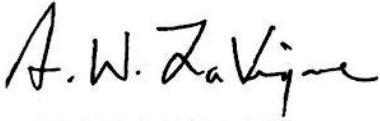
The seed industry supports the existing requirements in the Renewable Fuel Standard because they support innovation. The significant reduction that is proposed will undermine the growth of the vital renewable fuels sector. The seed industry is developing new varieties and feedstocks which will benefit a range of fuels from conventional ethanol to advanced biofuels. This technology, in part, is being developed due to the certainty provided by the RFS. As an example, innovative new technologies will allow by-products such as wheat straw and corn stover to be processed into ethanol. If adopted, the proposed change would permanently alter the RFS and set a dangerous precedent for future Renewable Volume Obligation (RVO) rulemakings.

This administration has always recognized the contribution that ethanol is making to reducing greenhouse gases and helping the U.S. move to low carbon energy sources. A recent lifecycle analysis of corn ethanol found that greenhouse gas emissions were reduced by an average of 34 percent compared to gasoline over four years. This is not the time to reduce the U.S. commitment to renewable fuels.

Farmers will begin planting shortly. Reducing the RFS will create uncertainty for farmers, commodity markets and seed companies in 2015 and beyond. Rural employment and income have risen as ethanol production has expanded under the RFS. In 2012, over 87,000 American jobs were directly tied to the production of ethanol. Many of these are in local ethanol plants in rural America. Furthermore, American ethanol added more than \$43 billion to the national Gross Domestic Product in the past year.

The American Seed Trade Association supports the RFS because it provides a stable environment for investment in innovation. Reducing the RFS sends exactly the wrong signal to companies and communities that are working towards a future with a robust American produced fuel supply.

Sincerely

A handwritten signature in black ink, reading "A.W. LaVigne". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Andrew W. LaVigne  
President & CEO