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VIA ELECTRONIC FILING
August 31, 2017

U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OAR-2017-0091 — Renewable Fuel Standard Program: Standards for 2018 and Biomass-Based Diesel Volume for 2019

Dear Administrator Pruitt,

The National Biodiesel Board appreciates the opportunity to submit comments on the proposed Renewable Fuel Standards for 2018 and Biomass-Based Diesel Volume for 2019, and we appreciate the efforts of you and your staff to work constructively with all stakeholders during this process. Our attached comments respectfully urge you to increase the advanced biofuel volume and the biomass-based diesel volume in the final rule.

The purpose of the RFS is to promote growth in our nation's biofuel supply. The biomass-based diesel industry has helped achieve Congress's objective by repeatedly exceeding annual biomass-based diesel volumes and comprising the majority of the annual advanced biofuel volumes. In doing so, the biomass-based diesel industry has grown to support over 64,000 jobs (the majority in rural America), while improving energy security, reducing wastes and emissions, and increasing the value of the products of American farmers.

EPA's proposed rule is a reversal of progress under the RFS that would set back the biomass-based diesel industry and stifle future innovation and investment. For the first time, it reduces the advanced biofuel volume below what the industry has already achieved, while freezing the biomass-based diesel volume in place. The proposed rule is thus at odds with Congressional intent to promote renewable fuels, as well as EPA's prior rules setting advanced biofuel volumes at "reasonably attainable" levels.

We urge you to increase the 2018 advanced biofuel volume to at least 4.75 billion gallons and the 2019 biomass-based diesel volume to at least 2.5 billion gallons. The biomass-based industry can support even greater volumes thanks to its extensive capacity and infrastructure, but those volumes are the minimum required to keep the industry moving forward as Congress intended. Increasing the volumes to at least those levels will ensure the industry is able to continue to innovate and expand, further enhancing the United States' energy security, environment, and economy.

Sincerely,

Doug Whitehead
Chief Operating Officer
National Biodiesel Board