



FORGING a PARTNERSHIP *between FARMERS and CONSUMERS*

September 26, 2012

Air and Radiation Docket
Docket ID No. EPA-HQ-OAR-2012-0632
Environmental Protection Agency
Mailcode: 6102T
1200 Pennsylvania Avenue NW.
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OAR-2012-0632. Request for Comment on Letters Seeking a Waiver of the Renewable Fuel Standard

The Ohio Farm Bureau Federation is the largest general farm organization in the state of Ohio with more than 214,000 members located across all of Ohio's 88 counties. Our members produce virtually every kind of agricultural commodity and as a result, Ohio Farm Bureau is very interested in the current request for a waiver of the Renewable Fuel Standard. We appreciate the opportunity to comment on the above-captioned rulemaking

While the Ohio Farm Bureau recognizes that the drought has had harsh impacts on many farmers across our state, we do not believe that a waiver of the Renewable Fuel Standard would provide meaningful relief to livestock producers at this time. Steps that are being taken to alleviate feed-related concerns such as relaxing restrictions on haying and grazing on Conservation Reserve Program acres provide a better solution to this issue.

In addition, the Renewable Fuel Standard contains flexibility to address unique market conditions and unusual events such as a drought. Petroleum refiners and blenders have the ability to claim credit for the use of ethanol over the mandated levels in previous years through the use of Renewable Identification Numbers. Use of the current relatively high inventory of ethanol combined with the power of market forces should serve to alleviate both supply and price concerns related to the current corn crop situation.

In summary, while we appreciate the hardships this drought has brought to both Ohio's crop and livestock producers, we believe that a waiver is not an effective solution, will not provide true relief to our livestock farmers and may cause severe long-term damage to an industry that is critical to our nation's fuel supply.

Sincerely,

John C. Fisher
Executive Vice President
Ohio Farm Bureau Federation

CC: Ohio Congressional Delegation
Ohio Farm Bureau Board of Trustees

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