

January 30, 2020

Via Electronic Filing ([www.regulations.gov](http://www.regulations.gov))

US Department of Agriculture  
Commodity Credit Corporation.  
Rural Business-Cooperative Service.

Re: Docket No. RBS-20-BUSINESS-0002

To whom its may concern,

I write on behalf of the nearly 19,000 family farmers, ranchers and rural community members who comprise the South Dakota Farmers Union (SDFU), the largest agriculture organization in the state of South Dakota. Many of our members contribute greatly to the state and national ethanol industry. Often times, their operations depend on the economic benefits created by the industry's expanded commodity markets and opportunities for diversification.

As has been shown by numerous studies, ethanol provides significant air quality and resulting health benefits, in addition to providing much needed jobs, stability and investments for the economies of rural communities dotted across our state. If the US Department of Agriculture (USDA) neglects to prioritize incentives for higher blends infrastructure our nation-wide health and economies of our most at risk rural communities are at stake.

Ethanol, a renewable fuel, changes the emissions profile of gasoline, creating a cleaner, safer motor vehicle fuel. Real-world evidence shows use of ethanol blends reduces emissions of carbon monoxide, particulate matter, air toxic chemicals, and greenhouse gases compared to burning petroleum gasoline. With higher octane fuels the motor can burn even more efficiently. This results in better overall air quality than when vehicles burn conventional gasoline, significantly improving public health. Levels of contained octane regardless of ethanol blends, should be labeled on all pumps, enabling the consumer to make educated and straightforward buying decisions based on quality.

SDFU feels it is vital for the USDA to label pumps dispensing fuels that contain blends of E30 or higher with signage communicating its environment and health benefits, such as "Enviro Friendly," "Premium," or other quality portraying terms. The average consumer must understand that by choosing fuels with high blends of ethanol they are choosing a fuel that will directly benefit the health of mass populations and the well-being of farmers and rural communities. By marketing E30's truest qualities and long term impacts you are allowing the consumer to be a part of the solution to our nation's poor air quality. If no action is taken in portraying fuels containing E30 or higher as the environmentally smart choice, we as a nation are likely to fall deeper into health and environmental crisis.

We urge you to address the current emergency that is the state of our air and environmental quality. It is vital that you acknowledge the promotion of gasoline with higher blends of ethanol as an avenue for relief from the largest impacts of pollution and incentivize infrastructure that allows access to these blends.

Thank you for the consideration of these remarks.

Best Regards,



Doug Sombke  
President, South Dakota Farmers Union