



July 8, 2015

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Administrator McCarthy,

On behalf of the American Sportfishing Association (ASA), I am writing to express our continued concerns with implementation of the Renewable Fuel Standard (RFS), specifically in regards to the recently proposed ethanol targets for 2015 and 2016. Mounting research has demonstrated the risk of ethanol to marine engines, and the ever-increasing renewable volume requirements have put consumers at risk.

As the nation's recreational fishing trade association, ASA represents sportfishing manufacturers, retailers, wholesalers, and angler advocacy groups, as well as the interests of America's 46 million recreational anglers. ASA also safeguards and promotes the social, economic, and conservation values of sportfishing in America, which result in a \$115 billion-a-year impact on the nation's economy.

Half of all anglers use a boat as a means to fish, hence it is imperative to ensure safe fuels for our industry members and the 46 million anglers that go fishing annually. Our main point of contention with the RFS is not with the policy as a whole, but rather the ethanol provision and inertia in fixing the policy. Safety and consumer costs are our top concerns. It bears reminding that ethanol above 10 percent is corrosive to marine engines. At or below that concentration is manageable but greater levels create problems in many different types of engines that would deem it unacceptable for a regulatory agency to disregard.

Several published studies have demonstrated the negative effects of ethanol on engine durability and performance. There is an urgent need to balance the drive towards energy efficiency and independence with the reality of the blend wall, i.e., that gas consumption has declined because Americans are driving less and they are driving more fuel efficient vehicles. It is not that ASA opposes ethanol in fuel; we recognize its usefulness and moderate applications. However, the targets set by Congress in 2007, though the best possible predictions at the time, were above actual demand and therefore must be adjusted.

Legislative attempts to amend the broken RFS have yet to be enacted. Therefore, Congress's inaction puts this policy in your hands. We urge you to heed the admonition of scientists and engineers and

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acknowledge that the consumer demand is not in line with RFS requirements. Please lower the Final Ruling ethanol volumes proposed for this year and 2016.

We appreciate the opportunity to share these views. If you have any questions, please do not hesitate to contact me.

Sincerely,

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