



March 9, 2026

Rajinder Sahota
Deputy Executive Officer
California Air Resources Board
1001 I St
Sacramento, CA 95814

Re: January 20, 2026, Cap-and-Invest 45-day Regulatory Amendment Package

Dear Ms. Sahota

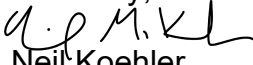
The Renewable Fuels Association (RFA) appreciates the opportunity to comment on the Initial Statement of Reasons package for the Cap-and-Invest (C&I) Regulation. The RFA is the leading trade association for America's ethanol industry. Our mission is to drive growth in sustainable renewable fuels and bioproducts for a better future.

RFA opposes the inclusion of fossil denaturant in ethanol as an obligated fuel under the proposed amendments. The costs to ethanol producers, consumers and the entire supply chain to obligate fossil denaturant in the C&I program far outweigh the negligible GHG benefits from such a requirement. With the declining production of gasoline in California and rising costs of fuels to California consumers, CARB should encourage the increased supply of lower cost, lower emitting ethanol.

Ethanol producers are required by federal law to add two percent denaturant to pure ethanol to render it unfit for human consumption. This is an antiquated regulation dating back to the days of Prohibition. There are better, lower cost methods of ensuring that ethanol stays out of the beverage ethanol supply.

Rather than unnecessarily penalizing ethanol producers and consumers with added costs of compliance under the C&I program, RFA encourages CARB join the ethanol industry in petitioning the federal government to remove the denaturant requirement for ethanol fuel, further increasing the supply of lower cost, cleaner burning renewable fuels to California,

We look forward to continuing to work with CARB in meeting California's climate goals.

Sincerely,

Neil Koehler
Policy Advisor