

September 14, 2026

Lauren Sanchez, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Amendments to the California Reformulated Gasoline Regulations to Allow Gasoline Containing up to 15 Percent Ethanol

Dear Chair Sanchez and Members of the Board:

The Renewable Fuels Association (RFA) appreciates the opportunity to comment on the California Air Resources Board's (CARB) proposed amendments to the California Reformulated Gasoline (CaRFG) Regulations to allow gasoline containing more than 10.1 percent and no more than 15 percent ethanol by volume (E15). 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.

California consumers continue to face increasingly high gasoline costs, while the State's gasoline market remains dependent on a limited number of supply sources. Expanding access to E15 will provide consumers with another gasoline option, expand the pool of available fuel supply, and utilize ethanol's value as a low carbon, high-octane, cost-competitive blending component. A workable E15 framework can therefore provide both consumer savings and greater flexibility in California's gasoline supply.

RFA has actively participated throughout CARB's entire E15 rulemaking process, including through comments submitted in response to CARB's November 2025 E15 Scoping Workshop.¹ In those comments, RFA emphasized that E15 should be incorporated into California's existing gasoline program and that suppliers should retain flexibility regarding how E15 is produced and distributed. RFA appreciates that CARB's proposal reflects those principles and establishes a practical framework for implementation of E15.

¹ Renewable Fuels Association, Comments on Scoping Workshop on E15 Use in California (Nov. 18, 2025), https://ww2.arb.ca.gov/system/files/webform/public_comments/54766/rfa-comments-on-e15-scoping-workshop-11-18-25.pdf

The California Legislature has provided clear direction supporting E15 deployment. Assembly Bill 30 established the statutory framework for E15 while CARB completed the necessary technical and environmental review, and Senate Bill 795 addressed remaining equipment-related barriers.^{2, 3}

RFA appreciates CARB's work to develop this proposal and encourages the Board to finalize the proposed CaRFG amendments, while continuing to coordinate with the Office of the State Fire Marshal (OSFM) and other State agencies on implementation matters.

I. E15 Should Be Regulated as Gasoline Within the Existing CaRFG Framework

RFA strongly supports CARB's proposed decision to regulate E15 as gasoline within the existing CaRFG framework rather than as a separate alternative or specialty fuel. As RFA explained in its November 2025 Comments, E15 is a common gasoline blend that can move through California's existing gasoline supply chain and therefore does not require a separate regulatory architecture.⁴ CARB's proposal appropriately retains the existing CaRFG framework while making targeted changes necessary to accommodate gasoline containing more than 10.1 percent ethanol.

E15 is not an alternative fuel; rather it is an allowable gasoline blend that displaces other gasoline blends with lower concentrations of ethanol (e.g., E10), providing incremental supply along with cost savings and emission reductions from gasoline use. CARB appropriately recognizes this reality through proposed amendments to Sections 2260, 2262, 2262.5, 2265, and 2266.5, which integrate E15 into the existing CaRFG program while preserving the basic structure of California's gasoline regulations.⁵

This approach is particularly important because E15 can be produced at several points in the existing gasoline supply chain. Certified CARBOB can be blended with ethanol at the terminal to produce finished E15; qualifying finished CaRFG/E10 can be further blended with ethanol downstream of the terminal to create E15; and E10 and E85 can be blended in an appropriate retail configuration to produce E15. These pathways involve different gasoline streams and points of blending, but each can provide a compliant means of producing finished E15. Treating E15 as gasoline allows regulated parties to use these existing supply-chain mechanisms without creating unnecessary distinctions or duplicative certification requirements.

² California Assembly Bill 30 (Alvarez), Chapter 247, Statutes of 2025, authorizing sale of gasoline blends containing 10.5% to 15% ethanol pending completion of the multimedia evaluation and CARB rulemaking.

³ California Senate Bill 795 (Archuleta, 2026), authorizing use of certain gasoline vapor-control equipment approved for E10 where manufacturers certify compatibility with E15 and preserving State Fire Marshal oversight.

⁴ Renewable Fuels Association. (2025, November 18). *Comments on Scoping Workshop on E15 Use in California*.

⁵ California Air Resources Board. (2026). *Proposed Amendments to the California Reformulated Gasoline Regulations Staff Report: Initial Statement of Reasons* ("ISOR"), Section I.A, Overview of the Proposed Amendments (describing production of E15 through CARBOB blending, addition of ethanol to CaRFG, and blending of E85 with E10).

II. The Proposed 10.1-to-15-Percent Ethanol Range Should Be Maintained

RFA supports CARB's proposal to define E15 as gasoline containing more than 10.1 percent and no more than 15 percent ethanol by volume. The proposed range appropriately accommodates normal commercial blending operations while establishing a clear regulatory boundary for E15.

III. CARB Appropriately Establishes E15-Specific Oxygen Content Standards

RFA strongly supports CARB's proposed amendments to Sections 2262 and 2262.5 establishing oxygen-content standards applicable to E15. These amendments are essential to successful implementation of E15 in California. The existing oxygen-content provisions were developed around gasoline containing up to 10 percent ethanol by volume and therefore cannot accommodate E15 without modification. CARB appropriately addresses this issue by establishing an oxygen-content cap designed specifically for gasoline containing up to 15 percent ethanol.

This approach is also consistent with CARB's implementation of Assembly Bill 30, under which CARB recognized that the existing oxygen-content limits could not reasonably be applied to E15 while permanent regulations were being developed.⁶

By replacing that interim approach with clear regulatory standards, CARB provides the certainty needed for fuel suppliers, terminals, marketers, and retailers to make long-term supply and investment decisions. Just as importantly, the amendments reinforce that E15 will be treated as a compliant gasoline blend within California's existing fuel program. For these reasons, RFA supports the proposal to increase the oxygen cap limit to six percent to accommodate ethanol blends up to 15 percent.

IV. CARBOB, CaRFG/E10, and E10/E85 Blending Provide Necessary Supply-Chain Flexibility

RFA strongly supports CARB's decision to preserve multiple pathways for producing E15. As RFA noted in its November 2025 Comments, implementation flexibility will be critical to successful market development, particularly during the early stages of E15 deployment when dedicated supply may not be available through every distribution channel.

The proposal appropriately recognizes that E15 may be produced through a variety of existing fuel supply pathways, including blending ethanol with certified CARBOB at the terminal, adding ethanol to qualifying CaRFG/E10 downstream of the terminal, and blending E10 with E85 to produce E15.⁷ By accommodating these pathways, CARB builds upon existing infrastructure, distribution systems, and compliance frameworks rather than creating unnecessary new requirements.

⁶ California Air Resources Board. (2025). *AB 30 E15 Implementation Guidance*

⁷ CARB ISOR, Section I.A and Section 2266.5 discussion, describing E15 production through certified CARBOB blending, downstream ethanol blending into qualifying gasoline, and E10/E85 blending pathways.

RFA particularly supports the proposed downstream blending flexibility for qualifying CaRFG/E10. This pathway avoids making dedicated terminal-supplied E15 a prerequisite for retail availability and provides an important mechanism for expanding consumer access to E15 as the market develops. Likewise, the E10/E85 pathway provides additional flexibility for retailers that already market E85 and may not have access to a dedicated E15 supply stream.

Preserving multiple compliant production pathways is especially important in California's constrained fuel market. Suppliers, terminals, marketers, and retailers operate under different infrastructure and logistical circumstances, and no single supply pathway will be appropriate in every situation. By allowing E15 to be produced through CARBOB blending, downstream blending of qualifying gasoline, and E10/E85 blending, CARB maximizes opportunities for voluntary E15 deployment while reducing implementation barriers and supporting greater fuel choice and supply flexibility for California consumers.

For these reasons, RFA strongly supports preserving the proposed CARBOB, CaRFG/E10, and E10/E85 pathways in the final regulation.

V. Federal E15 Labeling and Dispenser Requirements Should Remain the Applicable Requirements

RFA supports CARB's proposal to rely on existing federal E15 labeling requirements rather than impose an additional California-specific label. RFA discussed the importance of avoiding duplicative state requirements in its November 2025 Comments, and CARB's proposal appropriately recognizes that federal requirements already address E15 labeling and misfueling mitigation. An additional California-specific label would add complexity without a corresponding fuel-quality or emissions benefit.

RFA likewise supports CARB's decision not to impose a separate E10 hose requirement solely because a retailer offers E15. Federal requirements establish permissible E15 dispenser configurations and applicable misfueling controls. Where equipment is compatible with E15 and the dispenser configuration complies with applicable federal requirements, an additional California-specific dedicated-hose requirement is unnecessary. Maintaining this approach will reduce the cost and complexity of E15 conversion for retailers while preserving applicable federal safeguards.

VI. No Separate E15-Specific Octane Posting Requirement Is Necessary

RFA supports CARB's decision not to establish a separate E15-specific octane-posting requirement. As reflected in RFA's November 2025 Comments, E15 is marketed elsewhere today at multiple octane grades. E15's octane grade at the pump depends on the gasoline blendstock and other components used in the formulation. Existing requirements governing accurate octane representation therefore provide an appropriate framework without creating a new state requirement based solely on ethanol content.

VII. CARB's Technical Record Supports Final Adoption

RFA appreciates the extensive technical work CARB has undertaken to evaluate E15 in California. The California Multimedia Evaluation considered E15 relative to E10 across environmental media and public-health endpoints, and CARB completed peer review before the final Tier III report was submitted to the California Environmental Policy Council, which approved the evaluation in August 2026.⁸

The record also includes California-specific vehicle emissions testing conducted by the University of California, Riverside. Testing of twenty vehicles comparing E10 and E15 identified reductions in particulate matter, hydrocarbon gas emissions, carbon monoxide, and nitrogen oxides when E15 replaced E10.⁹ This California-specific record, together with the broader body of experience with E15, provides a substantial technical basis for incorporating E15 into the existing CaRFG program.

RFA believes CARB has completed the technical work necessary to establish permanent E15 requirements and supports moving the proposal to final adoption.

VIII. CARB Should Move Forward Promptly While Coordinating With OSFM

RFA supports CARB moving forward expeditiously with finalization of the CaRFG amendments while coordinating with OSFM on remaining equipment issues. AB 30 established the statutory framework for E15, and SB 795 provides additional direction regarding equipment compatibility and the respective roles of CARB, OSFM, and equipment manufacturers.

RFA appreciates these legislative actions and encourages the agencies to proceed expeditiously on parallel tracks. CARB has completed the technical work necessary to establish the permanent fuel requirements, while OSFM can continue addressing equipment certification and safety matters within its jurisdiction. Clarification of remaining equipment issues should not delay finalization of the CaRFG amendments.

Prompt adoption is important because suppliers, terminals, marketers, and retailers need regulatory certainty to make supply, infrastructure, and investment decisions. Finalizing the rule now will allow those decisions to proceed while CARB and OSFM continue coordinating vapor recovery equipment implementation.

⁸ California Air Resources Board, *California Multimedia Evaluation of Gasoline Containing up to 15 Percent Ethanol (E15)*, including Staff Written Summary, Tier III Report, agency evaluations, and peer review materials

⁹ University of California, Riverside. (2022, June). Comparison of Exhaust Emissions between E10 CaRFG and Splash-blended E15. https://ww2.arb.ca.gov/sites/default/files/202207/E15_Final_Report_7-14-22_0.pdf

IX. E15 Will Provide Important Consumer and Supply Benefits

The benefits of the proposed rule extend beyond regulatory certainty. Ethanol is a low carbon, high-octane, cost-competitive blending component that can expand the pool of fuels available to California consumers and provide an additional source of gasoline supply. Greater access to E15 can therefore provide consumers with additional choice while helping reduce gasoline costs.

A July 2024 analysis by economists at the University of California, Berkeley and the U.S. Naval Academy estimated that E15 could reduce gasoline prices for California consumers by approximately 20 cents per gallon, resulting in approximately \$2.7 billion in annual consumer savings.¹⁰ More recently, analysis by an independent petroleum refining expert found E15's cost benefits have averaged 57 cents per gallon since the beginning of the Iran conflict.¹¹ These economic benefits underscore why the regulatory flexibility in CARB's proposal is important. Authorizing E15 while unnecessarily restricting the pathways through which it can be produced or dispensed would diminish the practical value of the rule to California's consumers and the environment.

CARB's proposal largely avoids negative outcomes by allowing multiple compliant supply pathways and relying on existing regulatory and infrastructure systems. RFA supports preserving that flexibility.

X. CARB Should Finalize the Proposed Amendments Without Unnecessary Delay

California has completed the substantial technical work necessary to establish permanent E15 requirements. The Legislature has authorized E15, CARB has completed its multimedia evaluation, California-specific emissions testing has been conducted, and the Board has developed a regulatory framework for incorporating E15 into the existing gasoline program.

RFA therefore urges CARB to finalize the proposed amendments substantially as proposed and without unnecessary delay. Prompt finalization will provide suppliers, terminals, marketers, and retailers with the regulatory certainty necessary to make supply and investment decisions and will allow E15 to reach California consumers as soon as practicable. CARB should continue coordinating with OSFM and other agencies on equipment implementation, but those efforts should proceed in parallel with finalization of the fuel rule.

XI. Conclusion

Thank you for the opportunity to comment on CARB's proposed amendments to the CaRFG regulations. With the passage of AB 30 and SB 795, California has a significant opportunity to

¹⁰ Kaplan, Scott, and David Zilberman. 2024. "The Impact of Introducing E15 in California." University of California, Berkeley. July 9, 2024.

¹¹ Hoekstra, George. September 8, 2026. "The Economic Incentive for Blending Ethanol into Gasoline in 2026." *Analysis commissioned by the Renewable Fuels Association*.

provide consumers with greater access to lower-cost, cleaner-burning fuel while expanding and diversifying the State's gasoline supply.

RFA appreciates CARB's efforts to complete the extensive technical evaluation and regulatory work necessary to make E15 a permanent gasoline option in California. The technical record supports the proposed approach, and the flexibility CARB has incorporated for producing and distributing E15 will be important to ensure that the fuel can reach consumers efficiently and without unnecessary cost.

RFA encourages CARB to move expeditiously to final adoption of the proposed amendments while continuing to coordinate with the OSFM and other State agencies on remaining equipment and implementation issues. Finalizing the fuel regulations will provide the regulatory certainty necessary for suppliers, terminals, marketers, and retailers to make the investments and supply arrangements needed to bring E15 to California drivers.

RFA appreciates CARB's consideration of these comments and stands ready to continue working with CARB, the OSFM, and other State agencies to support the rapid and successful implementation of E15 in California.

Sincerely,



Maddie Jenks
Director of Regulatory Affairs