September 14, 2026

Clerk's Office

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Via electronic submission

RE: Comments on Proposed Amendments to the California Reformulated Gasoline Regulations for E15

On behalf of more than 40,000 dues-paying corn farmers and over 500,000 growers contributing to corn checkoff programs nationwide, the National Corn Growers Association (NCGA) appreciates the opportunity to comment on the California Air Resources Board's (CARB) Proposed Amendments to the California Reformulated Gasoline Regulations (Proposed Amendments) implementing Assembly Bill (AB) 30 and establishing fuel specifications for gasoline containing up to 15 percent ethanol (E15).

NCGA previously commented on CARB's October 2025 E15 Scoping Workshop[1], urging CARB to incorporate E15 into the California Reformulated Gasoline (CaRFG) system and to provide clear, timely regulatory certainty for the marketplace. We are pleased that the Multimedia Evaluation required under Health and Safety Code section 43830.8 is now complete, and that the California Environmental Policy Council concluded on August 18, 2026, that E15 use in California does not pose a significant adverse impact on public health or the environment relative to CaRFG[2]. This finding confirms what the record has shown throughout this process, and it clears the way for CARB to finalize the Proposed Amendments without further delay.

CARB's Proposal to Regulate E15 as CaRFG Provides the Market Certainty NCGA Has Sought

NCGA supports CARB's proposal to regulate E15 as part of the existing CaRFG specifications rather than as a separate alternative or flex fuel[3]. This approach is consistent with how EPA and the California Department of Food and Agriculture's Division of Measurement Standards already treat E15, and it avoids the added cost, delay, and market confusion that a separate fuel category would create. Retailers need a stable, predictable regulatory pathway to justify continued investment in blending and retail infrastructure, and codifying E15 within CaRFG delivers that.

NCGA also supports CARB's proposal to allow downstream blending of E85 with E10 to produce E15 at retail sites[4]. Blender pumps are already in wide use in the E15 markets our checkoff-funded infrastructure programs have helped build, and permitting the same approach in California will lower the barrier to entry for retailers weighing whether to offer E15, without compromising fuel quality or safe operation.

No Additional Misfueling Requirements Are Necessary

NCGA supports CARB's determination that no California-specific misfuelling labeling requirements are needed beyond the existing federal scheme. EPA already requires Misfueling Mitigation Plans and requires retailers to label dispensers clearly[5]. NCGA and its state affiliate partners have helped retailers upgrade infrastructure through

[1]National Corn Growers Association, Comments on CARB E15 Scoping Workshop, Nov. 5, 2025.
[2]California Environmental Policy Council, Resolution on the Multimedia Evaluation of E15 (Aug. 18, 2026).
[3]CARB, Proposed Amendments to the California Reformulated Gasoline Regulations, Staff Report: Initial Statement of Reasons, at 14–17 (July 28, 2026) (ISOR).
[4]ISOR at 19 (retail blending of E85 with E10 to produce E15).
[5]40 C.F.R. § 1090.1510 (EPA retail dispenser labeling requirements for E15).

USDA's Higher Blends Infrastructure Incentive Program and state grant programs for over a decade[6], and in that time we have received no complaints of misfuelling, engine damage, or related consumer harm at the retail level. Layering additional California-specific labeling on top of the federal requirements would add cost and complexity without a corresponding safety benefit.

CARB's Cost-Benefit Analysis Should Reflect the Full Economic Picture

California represents a 600- to 800-million-gallon incremental ethanol market — roughly 250 to 270 million bushels of corn annually[7] — at a moment when demand growth for U.S. corn is critical to farm income nationwide. E15 sales nationally reached a record 1.52 billion gallons in 2025 and continue to grow[8], reflecting real consumer demand for a lower-cost fuel option. We encourage CARB, in any supplemental cost-benefit analysis accompanying this rulemaking[9], to weigh this farm-economy benefit — and the savings E15 delivers to California drivers — alongside the retailer equipment and infrastructure costs it has estimated, so that the full picture of the Proposed Amendments' value to the state is reflected in the record.

NCGA Urges Timely Finalization

AB 30 made E15 legal in California on an urgency basis, and California drivers and corn growers alike have waited nine months for the regulatory certainty this rulemaking will provide. We urge CARB to finalize the Proposed Amendments promptly following the September 24, 2026, hearing, and to continue coordinating with other state agencies involved in E15 implementation so that this regulatory milestone translates into fuel actually reaching California pumps without unnecessary further delay.

Thank you for the opportunity to comment. We appreciate CARB's continued work to bring E15 to California and look forward to supporting the state's efforts to expand consumer choice and reduce transportation costs.

Sincerely,

Lane Howard

Director, Biofuels

National Corn Growers Association

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[6]U.S. Department of Agriculture, Higher Blends Infrastructure Incentive Program (HBIIP), rd.usda.gov/HBIIP.
[7]Robert White, Renewable Fuels Association Senior Vice President of Industry Relations & Market Development, cited in "RFA Continues Push for E15 in California," RFD-TV, 2025 (estimating the shift from E10 to E15 in California at roughly 267 million bushels of corn, or 800 million gallons of ethanol).
[8]Scott Richman, "Nationwide E15 Sales Jump 23% In 2025, Setting New Record," Renewable Fuels Association, Apr. 2, 2026.
[9]CARB, Appendix B: Supplemental Analysis on Costs and Benefits of Expanded E15 Availability, as Authorized by AB 30 (July 28, 2026).