

August 17, 2026

Yana Garcia
Secretary for Environmental Protection
Chair, California Environmental Policy Council
1001 I Street
Sacramento, CA 95814
Via electronic submission

RE: August 18 CEPC Meeting: Re E15 MME & Proposed E15 Regulation

Secretary Garcia:

Growth Energy greatly appreciates the opportunity to provide comments in response to the California Environmental Policy Council's (CEPC) meeting regarding the Multimedia Evaluation (MME) of E15 and further comments to follow on California Air Resources Board's (CARB) Proposed E15 Regulation. Growth Energy is the leading voice in America's biofuels industry, representing 98 U.S. plants that each year produce more than 9.5 billion gallons of renewable fuel; 126 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we work to bring better and more affordable choices at the pump to consumers, improve air quality, and protect the environment for future generations. As you know, we have worked extensively with the CEPC, CARB, and other agencies to provide detailed information on E15 including supporting extensive vehicle testing at University of California-Riverside. Outside of California, drivers have already tallied nearly 250 billion miles on this fuel without issue. We look forward to working with you to getting this important fuel to the California market and our comments follow below.

Environmental Value of E15

E15 is a lower cost fuel containing up to 15 percent ethanol and approved for use in gas-powered vehicles model year 2001 and newer, which is more than 96 percent of cars on the road today. As the CEPC considers the data presented in the E15 MME and CARB's proposed rule, we encourage the council to pass a resolution stating the use of E15 would have no significant adverse impact on public health or the environment. In fact, E15 use would result in significant beneficial impact: According to the Transportation Energy Institute, bioethanol has led all biofuels to have been among the largest contributors to the success of California's GHG reductions through the Low Carbon Fuel Standard (LCFS).¹ Increasing the ethanol content in California's fuel use would provide even further public health and environmental benefits.

We have noted in previous comments in response to proposed amendments of the LCFS, the Drive Forward program, and its predecessor that bioethanol is a primary solution for reducing carbon and air toxics emissions in the state's liquid fuel supply. Data from Environmental Health and Engineering shows that bioethanol reduces greenhouse gas emissions by an average of 46 percent compared to gasoline and

¹ https://www.transportationenergy.org/wp-content/uploads/2023/07/Decarbonizing-Combustion-Vehicles_FINAL.pdf

can provide even further GHG reductions with the utilization of readily available technologies.² CARB has previously recognized the contributions bioethanol can make to carbon reductions. In 2011, CARB reported the average carbon intensity (CI) for bioethanol at 88 gCO₂e/MJ. Through the end of 2022, the average recorded CI for bioethanol has decreased to 59.21 gCO₂e/MJ, a 33 percent reduction in CI.³ According to a 2024 study conducted by the Energy Futures Initiative Foundation, the average CI for bioethanol is now an even lower 53.6 gCO₂e/MJ.⁴

With respect to evaporative emissions, testing detailed in the E15 Multimedia Evaluation Tier II report showed that type of emissions declined 22% on average on a variety of vehicles using E15.⁵ In the same report, particulate matter emissions were shown to have a decrease as well:

“The PM mass showed strong, statistically significant fuel trends over the entire FTP cycle and each individual phase. For the cold-start and hot-running phases, PM mass emissions showed statistically significant reductions of 17% and 54%, respectively, for E15 compared to E10. Hot-start PM mass emissions were 43% lower for E15 compared to E10, at a marginally statistically significant level. The weighted PM mass emissions showed a statistically significant reduction of 18% for E15 compared to E10 across the fleet of 20 vehicles.”

The testing, conducted by University of California – Riverside, also saw consistent “statistically significant” reductions of an array of emissions across, including carbon monoxide, total hydrocarbons, and nonmethane hydrocarbon emissions.

Additionally, bioethanol boosts octane in fuel without the harmful impacts of alternative octane-boosting fuel additives such as aromatics.⁶ Decreasing aromatics in fuel has direct impacts on tailpipe emissions, with higher-ethanol fuels resulting in lower emissions of black carbon (BC), particle number (PN), benzene, toluene, ethylbenzene, m/p-xylene and o-xylene (BTEX), and olefins.⁷

Economic Value of E15

Today, nearly all gasoline in California—and across the U.S.—is blended with 10 percent bioethanol. In states where E15 is available, consumers regularly saved 10-30 cents per gallon this spring. In some cases, those savings were more than \$1 per gallon.⁸

Consumers have embraced E15’s reputation as a more environmentally beneficial, more affordable fuel. This rapid expansion of retailers offering E15 began in 2012, shortly after the EPA approved it, at which time there were *zero* retailers offering it. E15 is now available in 35 states at more than 5,100 retail locations and drivers in America have relied on E15 to drive 248 billion miles.

² <https://iopscience.iop.org/article/10.1088/1748-9326/abde08/pdf>

³ <https://ww2.arb.ca.gov/resources/documents/lcfs-pathway-certified-carbon-intensities>

⁴ https://efifoundation.org/wp-content/uploads/sites/3/2024/09/Ethanol_Roadmap.pdf

⁵ https://ww2.arb.ca.gov/sites/default/files/2025-03/E15_MME_Tier_II_Report_July_2023.pdf

⁶ Kazemiparkouhi et al., *Comprehensive US database and model for ethanol blend effects on regulated tailpipe emissions*. 812 Science of The Total Environment 151426, (Mar. 2022).

⁷ MacIntosh, et al., *Response to Proposed Renewable Fuel Standard (RFS) Program Standards for 2023–2025*, Environmental Health & Engineering (Feb. 10, 2023).

⁸ <https://growthenergy.org/wp-content/uploads/ge-docs/e15-savings-at-the-pump.pdf>

California's 2025 legislative session saw the passage of AB 30, which allowed the sale of E15 in the state. Unfortunately, to date, no retailer has been able to offer this lower cost, lower emission fuel. Unnecessary regulatory hurdles are preventing the approval of dispensing equipment currently being utilized in the state to dispense E15.

Expanded E15 use in California can also help the state weather price and supply volatility in the global petroleum market like those we have seen in recent months. Increasing the percentage of low-carbon domestic energy in the state's transportation fuel matrix can help soften the impact of price spikes.

Given the broad evidence showing emissions reductions and consumer savings at the pump, we encourage the CEPC to quickly approve the resolution stating that E15 use would not adversely impact public health or the environment were CARB's Proposed E15 Regulation to go into effect.

More broadly, we look forward to working with you to give California drivers access to E15 as well as to help the state achieve its climate goals through the expanded use of bioethanol.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley". The signature is fluid and cursive, with a large, stylized "B" at the end.

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy