

January 15, 2024

California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

RE: Advanced Clean Cars II Amendment

Chair Randolph and Members of the Board:

Thank you for the opportunity to comment on potential changes to the Advanced Clean Cars II (ACCII) regulation. The Kansas Corn Growers Association (KCGA) represents more than 1,100 members on state and national legislative and regulatory issues and actively works with other organizations to maximize the voice of Kansas corn producers. KCGA is a staunch supporter of ethanol and flex-fuel vehicles (FFVs) and believes that they can be an integral part of a cleaner, more efficient transportation system.

Ethanol is a great solution for reducing carbon and air toxins in emissions in liquid fuel. Ethanol has been shown to reduce greenhouse gas emissions (GHG) by an average of 46 percent when compared to gasoline and has the potential for further reductions with available technologies. We also fully anticipate an even lower carbon intensity as new projects at ethanol refineries utilize new technologies that are cleaner and more efficient.

The expansion of higher ethanol blends and incentives for additional FFV production will greatly contribute to the state's GHG reduction goals. However, first, the state must address the availability of fuel that has a 15 percent blend of ethanol, E15. The use of E15 has been approved by the Environmental Protection Agency (EPA) for all passenger vehicles model year 2001 and new, which accounts for more than 96 percent of vehicles on the road today. Meanwhile, California is the only state that has not approved its sale and use. California is already selling a 10 percent blend of ethanol in nearly all gasoline. E15 is a cleaner, cheaper fuel. According to an analysis conducted by Air Improvement Resource (AIR), Inc. in 2020, if CARB not only approved E15, but replaced E10 with E15, this switch would be the GHG-reduction equivalent of removing more than 400,000 internal combustion engine (ICE) vehicles from California's roads without negatively impacting California drivers. Further, an analysis conducted by the Renewable Fuels Association (RFA) showed that the average price for E15 across the country was \$0.27 per gallon, or 7.4 percent, cheaper than E10.

Fuel containing 85 percent ethanol, E85, has also contributed significantly to California's GHG emission reduction goals. In 2022 alone, more than 103 million gallons of E85 were sold in the state, making it one of the largest consumers of this type of liquid fuel. The use of E85 will promote even greater reductions in GHG emissions and reductions of air toxins. This also led to California having one of the largest FFV fleets in the country. Given the clear benefits provided by E85 and FFVs, we would encourage CARB to explore ways to fully take advantage of these benefits. CARB should consider making FFVs the standard ICE vehicle in the state, creating new incentives for stations to sell more E85, and other incentives or standards that would fully utilize the benefits of E85 and FFVs.

KCGA looks forward to working with you and providing additional feedback and comments where necessary. We hope CARB fully understands the important role ethanol can play in making California's liquid fuel more sustainable and helping it achieve its emissions reductions goals.



Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Brent Rogers". The signature is fluid and cursive, with a prominent initial "B" and a long, sweeping underline.

Brent Rogers  
President  
Kansas Corn Growers Association