June 23, 2022

Chair Randolph and Members of the Board
California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: NCGA Comments on the Draft 2022 Scoping Plan

Dear Chair Randolph and Board Members:

Thank you for the opportunity to provide comments on CARB's 2022 Draft Scoping Plan. The National Corn Growers Association (NCGA) writes to share our view on CARB's extensive opportunity to achieve the state's carbon neutrality goals through use of low carbon fuels in transportation. On behalf of NCGA's 40,000 dues-paying corn farmers nationwide and the more than 300,000 corn growers who contribute to corn promotion programs in their states, we appreciate the opportunity to provide input as the primary producers of the feedstock for low carbon ethanol.

NCGA agrees with staff's decision to move forward with Alternative 3 as the main framework for the 2022 Scoping Plan. Alternative 3 is clearly ambitious, in line with CARB's stated goals. However, given the realities of California's current climate targets as well as the climate mitigating technologies available and under development, Alternative 3 offers feasible reductions, is more affordable and accessible to Californians, and aligns with existing statutes and executive orders. NCGA believes that a 2045 timeframe, accompanied with the deployment of a broad portfolio of solutions, will allow markets to develop and respond to the state's carbon neutrality targets, as well as allow emerging technologies more time to scale.

NCGA would like to specifically comment on E3's recently released "AB 32 GHG Inventory Sectors Modeling Data Spreadsheet." The only inclusion of ethanol as an alternative fuel in the inventory modeling comes from ethanol coupled with the use of gasoline as E10. This is misleading because the modeling does not include the potential for E15 in California, an active effort currently undergoing CARB's Fuels Multimedia Evaluation process, nor does the modeling account for recent growth in E85 consumption. Furthermore, E3's modeling does not align with modeling from University of California's Institute of Transportation Studies "Driving California's Transportation Emissions to Zero" report, released in April 2021. That report assumes E15 will be utilized in California no later than 2030.[1]

Linking ethanol use only with gasoline constrains ethanol's utility as an alternative fuel in higher blend applications, in which ethanol provides additional air quality and climate benefits that were recently assessed in a 2021 UC Riverside emissions study conducted in partnership with CARB's Industrial Strategies Division. We strongly urge CARB to consider ethanol as an alternative fuel independent from gasoline.

Low carbon fuels such as ethanol are a near- and medium-term solution. Ethanol is low-cost, readily available, and continually improving its carbon reduction score under the Low Carbon Fuel Standard (LCFS). In addition to carbon intensity reductions resulting from continuous improvements in farming

[1] University of California Institute of Transportation Studies. *Driving California's Transportation Emissions to Zero*. April 2021. https://escholarship.org/uc/item/3np3p2t0

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practices, ethanol producers are investing in and developing pathways to achieve net negative carbon scores, including greater production efficiencies, more renewable power and carbon capture, utilization, and storage technologies (CCUS) as they compete to access the California market. Ethanol use in vehicles also provides immediate air quality benefits by reducing harmful air pollutants such as CO2, NOx, PM, and VOCs at higher blends such as E15 and E85.

E85 is a proven low carbon, high octane fuel with an already large network of fueling stations across California and the United States. According to the Alternative Fuels Data Center, there are 274 publicly available retail E85 fueling stations across the state. Prior to the COVID-19 pandemic, California had experienced E85 consumption growth at an average compounded rate of 30 percent annually over the prior five years, with this growth largely backed by the stability of the LCFS. In 2021, E85 consumption grew to a record 62 million gallons, a 55 percent or 22-million-gallon increase from 2020, as California E85 demand continues to increase. There is clearly demand for ethanol's use and benefits beyond the octane it provides when blended with gasoline.

As California consumers are already taking advantage of the benefits of E85, the state is well positioned for a requirement that all PHEVs and remaining combustion vehicles be flex fuel vehicles (FFVs) beginning with MY2026. In fact, some FFVs in California are powered by a blend of 15 percent renewable naphtha with 85 percent ethanol. These vehicles use no fossil fuels, have improved air emissions profiles over other PHEVs, and have a low carbon intensity score. Moreover, E85 is typically sold at a lower price than gasoline, currently a savings of $2 or more per gallon, translating to monetary savings in addition to the significant air pollution savings.

The reality is that legacy combustion vehicles will remain on the road in 2045. In multiple instances, CARB staff have publicly assumed that to be true in previous workshops and updates to the Board (see Figure 1). Completion of CARB's Fuels Multimedia Evaluation Process for E15 would offer an immediate decarbonization opportunity in those millions of legacy vehicles between now and 2045. By also utilizing multiple vehicle technologies, including FFVs that employ E85 as an alternative to gasoline, California can avoid further air pollution that would otherwise be emitted, as the state transitions to a zero-emission fleet.

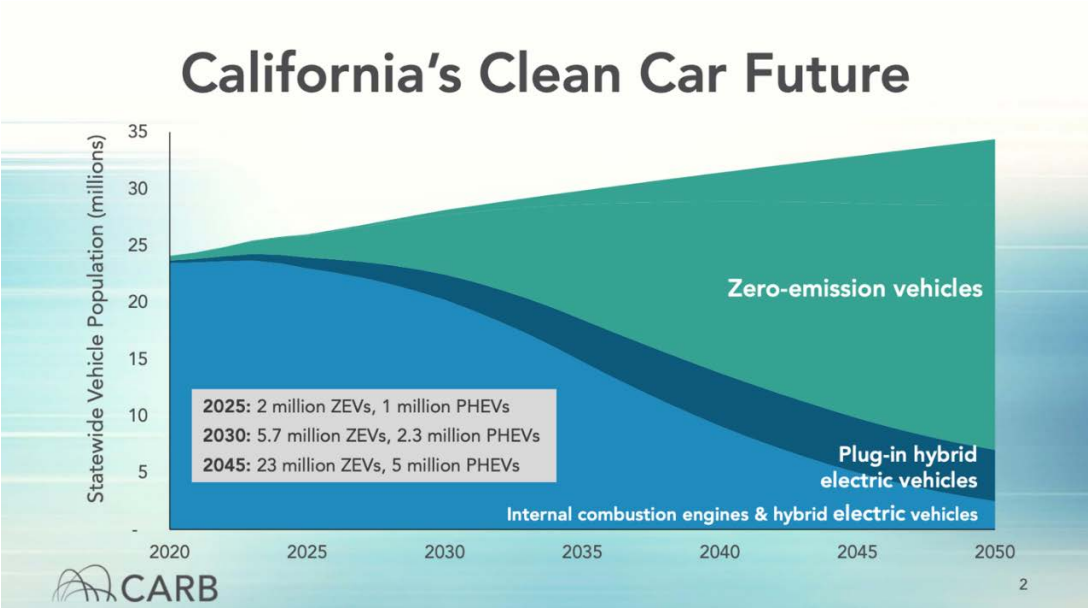


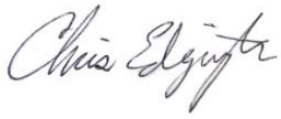
Figure 1 - Richard Corey's January 27, 2022, Presentation to the Board on CARB's 2022 Priorities

Ethanol can bridge the gap between petroleum-based fuels and electric vehicles. With Governor Newsom's Executive Order N-79-20 that creates a goal of 100 percent ZEV sales by 2035 and former Governor Brown's Executive Order B-55-18 that creates a goal to become carbon neutral by 2045, now more than ever it is important to find GHG reductions that can make an immediate impact. Ethanol can achieve those immediate reductions.

NCGA encourages CARB to view ethanol not through the confines of gasoline, but as a reliable, clean alternative fuel that can provide immediate emission reductions.

Thank you for the consideration of our comments.

Sincerely,



Chris Edgington, President
National Corn Growers Association