



June 9, 2021

Rajinder Sahota
AB 32 Climate Change Scoping Plan
Industrial Strategies Division
California Air Resources Board
1001 I St.
Sacramento, CA 95814

RE: NCGA Comments on the June 8 – 10, 2021, Scoping Plan Update Workshops

Dear Ms. Sahota,

Thank you for the opportunity to provide comments on CARB's June 8 – 10, 2021 workshop series to commence the development of the 2022 Scoping Plan update to achieve carbon neutrality by 2045. 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 ethanol.

Concerning the scoping plan at a high level, our farmers are increasingly interested in carbon credit opportunities that are emerging because of California's Cap and Trade, LCFS, and other states' carbon programs. These programs are creating real and sustained change on the farm through better soil management techniques. In addition to being low-cost carbon sinks¹, the programs are creating rural economic opportunities, and spreading awareness of the value of carbon-efficient agricultural practices. Improvements in agriculture production, including higher yields and decreases in fertilizer intensity, have contributed to a 23 percent reduction in corn ethanol's carbon intensity since 2005 and ethanol that is now 44 to 52 percent lower in carbon intensity than gasoline, according to [new analysis](#) from the U.S. Department of Energy's Argonne National Laboratory. Ongoing on-farm production improvements, along with new soil carbon credit opportunities, will continue to push corn ethanol toward net zero emissions.

Given the valuable role our farmers can play in California's programs, we would like to highlight the missed opportunities for decarbonization in the fuels portion of CARB's presentations. Generally, NCGA is concerned with CARB's lack of low carbon liquid fuels representation in the June 8 and 10 workshops. Low carbon fuels are among the most successful elements of the carbon reduction programs CARB has implemented to date. The LCFS is meeting or exceeding its targets of in-state carbon reduction, with liquid fuels playing a major role. Low carbon fuels like ethanol are being utilized as a near- and medium-term solution, yet that contribution to the

¹ https://www-gs.llnl.gov/content/assets/docs/energy/Getting_to_Neutral.pdf

state's success was not represented. Ethanol is low-cost, readily available, and continually improving its carbon reduction score under the LCFS. In fact, 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.

By focusing solely on the role of electrification, CARB loses sight of the valuable role ethanol can play in immediate emission reductions and associated air quality benefits. This sends a dampening signal to our farmers who are considering significant investments in carbon-friendly agricultural practices that CARB undervalues this carbon reduction opportunity.

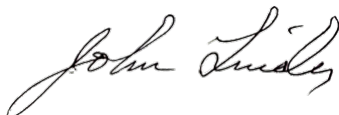
Ethanol can bridge the gap between petroleum-based fuels and electric vehicles. With Governor Newsom's Executive Order N-79-20 that creates a goal of 100 percent ZEV sales by 2035 and former Governor Brown's Executive Order B-55-18 that creates a goal to become carbon neutral by 2045, now more than ever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

Beyond ethanol's utility in all gasoline engines to reduce carbon and enhance performance, other vehicle technologies can better harness the air quality benefits of ethanol, like Flex Fuel Vehicles (FFVs). FFVs utilizing higher blends of low carbon ethanol, such as E85, can provide immediate CO₂ and NO_x reductions without tangibly altering the price of the vehicle and reducing fuel costs. E85 consumption has already grown rapidly in California, supported by the LCFS, but continued expansion of this low carbon alternative fuel depends on greater FFV availability. In fact, E85 is typically sold at a lower price than gasoline, translating to monetary savings in addition to the significant air pollution savings. Compared to gasoline, E85 leads to significant reductions in NO_x and CO₂ emissions, and E85 avoids use of toxic hydrocarbon aromatics in gasoline that are precursors to secondary organic aerosols that result in harmful fine particulate matter emissions that cause serious respiratory, cardiovascular, and other health harm, including premature death, according to the American Lung Association.

Highlighting the environmental and health benefits of low carbon liquid fuels like ethanol would provide CARB with a more diversified approach within its Scoping Plan – one that acknowledges different buyer behaviors, near-term infrastructure gaps for EV charging, and immediate carbon reduction benefits. NCGA asks CARB to incorporate renewable fuels into its future Scoping Plan discussions in a more robust way.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Linder". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Linder".

John Linder, President
National Corn Growers Association