



February 20, 2024

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

RE: National Corn Growers Association (NCGA) Comments on the Proposed Amendments to the Low Carbon Fuel Standard

Dear Chair Randolph and Members of the Board,

The National Corn Growers Association (NCGA) values the opportunity to provide comments on the proposed amendments to the Low Carbon Fuel Standard (LCFS).

NCGA represents 40,000 dues-paying corn growers and more than 300,000 farmers who contribute to corn promotion programs nationally. Along with its 50 affiliated state associations and checkoff organizations, NCGA works to protect and advance the interests of corn growers. NCGA recognizes CARB staff's leadership in continuing to refine the LCFS program to support California's ambitious climate goals and serve as an example to encourage similar programs elsewhere.

NCGA would like to provide the following comments in response to the proposed amendments to the LCFS:

2030 Target

NCGA is encouraged to see CARB's proposal of a 30% reduction in carbon intensity (CI) by 2030. This target can be reached at an accelerated pace through the implementation of fuel blends with up to 15% ethanol (E15) in California. NCGA urges CARB to adopt E15 due to the immediate benefits it can help achieve as a lower carbon and lower cost fuel which is readily available. Ethanol has a low-CI and can help reduce greenhouse gas (GHG), criteria, and toxic pollutant emissions. Compared to E10, E15 can reduce annual GHG emissions by 2 million metric tons.

Notably, California is the last state that has not approved E15 despite gasoline-ethanol blends having a long history of being used in the state.¹ Today, almost all gasoline sold in California

¹ [Montana Becomes 49th State to Approve the Sale of E15](#)

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uses blends of up to 10% ethanol (E10). As California looks to electrify much of its transportation, higher ethanol blends are a complementary solution, especially for hard-to-abate sectors and heavy-duty applications. California has long been a leader in championing progressive climate policies, with the LCFS being one of them. With more jurisdictions looking to introduce their own clean fuels programs, the lack of approval for E15 in California will be a significant obstacle to exporting the program as E15 helps garner agricultural support.

The ethanol industry and CARB have invested significant resources in conducting the proper analyses to get E15 approved in California. Among these efforts is the Multimedia Evaluation (MME) of E15, which is in the final stages.² In the Tier II Report for the MME, the ethanol industry and CARB jointly funded vehicle emission testing conducted by the University of California Riverside which found significant air quality improvements (see results in the table below).³ Throughout the MME process, ethanol stakeholders have been responsive and collaborative with CARB to ensure the evaluation could move at a quick pace.

E15 is a readily available and affordable solution which can swiftly enable additional CI reductions in the LCFS. Approving E15 in California will allow for the LCFS to be even more ambitious in setting targets and achieving California’s transportation decarbonization goals.

Pollutant	Reduction %	Statistical significance
NOx	3%	Not significant
THC	5%	Significant
NMHC	8%	Marginally significant
CO	17%	Significant
CO ₂	1%	Marginally significant
PM	18%	Significant
Solid Particle	12%	Significant

Figure 1, E15 Tier II Report – Vehicle Emission Testing Results, UC Riverside

Sustainability Requirements

NCGA asks CARB to reconsider the proposal for crop-based biofuel sustainability requirements. Requiring credit generators to track feedstocks back to their point of origin will impose an extensive regulatory burden with unclear benefits. Despite this proposal adding more responsibility and costs to farmers, it does not address our members’ requests for on-farm credits to reward better agricultural practices. Our members are already dedicated to improving their agricultural practices by continuing to advance and incorporate increased efficiencies in land, water, and energy use.⁴ In working towards these goals, U.S. corn growers are committed to reducing GHG emissions per bushel by 13% from 2020 to 2030.⁵

We suggest CARB take a step back from the proposed framework and instead explore a more sophisticated approach that would balance on-farm crediting with sustainability tracking and low carbon ag practices. Also, CARB should be weighing the incremental benefit of this additional

² [California Multimedia Evaluation of E11-E15 Gasoline-Ethanol Blends Tier I Report](#)

³ [California Multimedia Evaluation of E10 - E15 Gasoline Ethanol Blends Tier II Report](#) (p. 10-11, 29).

⁴ [NCGA Sustainability Report](#), Page 3.

⁵ [NCGA 2030 Corn Environmental Sustainability Goals](#)

data against information that is already collected and reported. For instance, Argonne’s Feedstock Carbon Intensity Calculator examines the CI variations of different farming practices for growing crops used for biofuel production.⁶ This tool uses data from key farming inputs from the Greenhouse Gases, Regulated Emissions, and Energy Use in Technologies (GREET) fuel-cycle model. In understanding the data and resources that are already available, this can better inform CARB’s concerns in verifying sustainability standards while preventing duplicative efforts and reporting for credit generators.

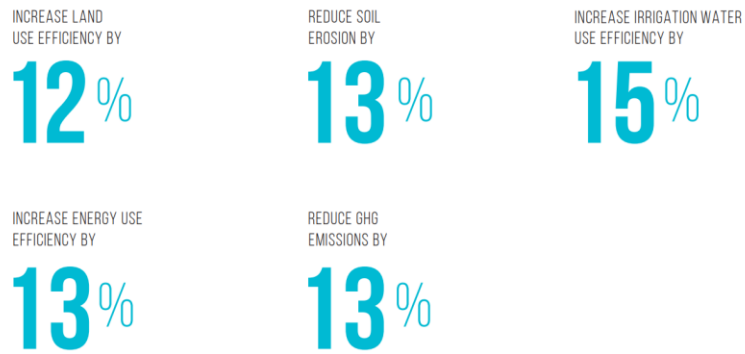


Figure 2, NCGA's 2030 Goals

NCGA appreciates the opportunity to provide feedback on the proposed amendments for the LCFS. We look forward to continuing our engagement with CARB both in the completion of this rulemaking and those to come.

Sincerely,

Harold Wolle, Jr.
President, National Corn Growers Association

⁶ [Argonne Feedstock Carbon Intensity Calculator](#)