american coalition for ethanol

September 14, 2026

Lauren Sanchez, Chair
California Air Resource Board
1001 I Street
Sacramento, CA 95814

Re: Initial Statement of Reason for the Proposed Amendments to the California Reformulated Gasoline (RFG) Regulations released on July 28, 2026

Submitted via electronic docket

Chair Sanchez and Members of the Board:

The American Coalition for Ethanol (ACE) appreciates the opportunity to provide comments on the Proposed Amendments to the California Reformulated Gasoline Regulations. ACE writes today in support of these regulations to the state's Reformulated Gasoline regulatory framework to allow for E15 sales in California as intended with the passage of AB 30 last year.

ACE is a grassroots advocacy organization, powered by rural Americans from all walks of life who have built an innovative industry that delivers homegrown biofuel and food for a growing world. Our nearly 300 members include farmers, companies that supply goods and services to the U.S. ethanol industry, and U.S. biorefineries supplying a large portion of the ethanol sold today in California. ACE members stand ready to provide more low-cost, lower-carbon ethanol to California marketers and retailers to further reduce vehicle emissions in the state, expand consumer choice, and reduce prices at the pump.

In order to provide this fuel, producers and marketers need clear regulations for certification of E15 complying with California regulations, and we recommend those regulations parallel federal oxygenate blending standards, including updating referenced ASTM standards to the most current test methods, while also providing consistency with other California agencies and regulations. ACE would like to see CARB adopt an approach to fuel specification similar to its determination no California-specific misfuelling and labeling regulations should be added beyond the federal requirements.

We appreciate the rule allowing retailers to blend E15 at the pump – which could expand the availability of both E15 and E85 – which is the cleanest and lowest-cost fuel in the market today. Allowing pump blending can also dramatically reduce the cost of infrastructure for offering E15 – utilizing existing tanks rather than requiring all the costs associated with burying new tanks, running new lines, and all the construction activities that accompany those additions.

Blending at the pump will also require being able to meter the actual gallons sold by product, to properly tax pump-blended E15 fuel made with fully taxed E10 and E85 which is taxed at a lower

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rate. Allocating sales properly is also necessary to avoid overstating E85 sales which could exceed current sales limits on the fuel.

While it is not specific to this rulemaking, controls on E85 sales should be revisited and removed, since such a regulation puts limits on pollution reduction and fuel cost savings, both of which are highly beneficial to drivers' pocketbooks while protecting the state environment and public health.

The enactment of AB 30, coupled with the recently passed E15 clean-up legislation giving the State Fire Marshal flexibility to allow the safe sale of E15 while completing required regulatory work for final approval, means California and its drivers could benefit from E15 availability as soon as the first quarter of next year.

ACE appreciates CARB's timely work on this rulemaking and its recognition of the part ethanol can play in reducing emissions in California. We thank you for allowing us to provide input on this proposal, and we offer our assistance if there is any way we can help bring E15 to the marketplace.

Thank you for your time and consideration of these comments, please contact me with any questions.

Sincerely,

Ron Lamberty, Chief Strategy Officer
American Coalition for Ethanol