

November 18, 2025

California Air Resources Board
Matt Botill
Division Chief, Industrial Strategies Division
1001 I Street
Sacramento, CA 95814

RE: Comments on Proposed Introduction of E15 Fuel in California

Mr. Botill,

As Iowa's Secretary of Agriculture, I appreciate the opportunity to provide comments on California's implementation of allowing the sale of E15 to consumers.

Iowa is the national leader in biofuel production, with 42 ethanol biorefineries and 10 biodiesel facilities producing 4.6 billion gallons of ethanol and 353 million gallons of biodiesel respectively in 2024. Iowa's renewable fuels industry creates value-added markets for corn, soybeans, and other agriculture feedstocks, provides good paying jobs for thousands of Iowans, and offers cleaner burning, more affordable, homegrown fuel options to consumers. Additionally, Iowa is a national leader in biofuels usage, with more than 13 years of E15 adoption. With almost half of Iowa's roughly 2,200 fuel retailers offering E15 today, I am hopeful that our track record can serve as a useful reference point as you work through implementation of this important policy.

When given the choice at the pump, Iowa drivers are consistently choosing E15, and it now represents a significant and rapidly increasing share of all gasoline gallons sold in our state. E15 usage in Iowa has continued to grow year over year, reflecting strong consumer confidence and clear market demand. Statewide, E15 sales have grown more than six-fold over the past five years, increasing from 41.6 million gallons sold in 2019 to 256.7 million gallons in 2024. Iowa's experience demonstrates that, once available, E15 quickly becomes a popular and mainstream fuel option.

E15 has also provided significant benefits to consumers who have faced rising costs over the last several years. E15 is almost always priced well below regular unleaded gasoline, saving drivers around 15 cents per gallon at the pump without asking them to change anything about how or where they fuel up. In 2024 for example, Iowa drivers saved an estimated \$38.5 million by choosing E15 over E10, demonstrating that E15 is a simple, immediate way to reduce fuel costs for families.

Finally, I want to share Iowa's real-world experience with fuel infrastructure compatibility. As noted earlier, E15 has been available in Iowa for well over a decade and during that time we have not encountered widespread or systemic compatibility challenges. In fact, existing tanks,

pipng, and dispensers have overwhelmingly proven capable of safely and reliably handling E15. In fact, our confidence in the durability of existing infrastructure was a key reason the Iowa General Assembly enacted Iowa's E15 Access Standard.

Beginning January 1, 2026, Iowa's E15 Access Standard will take effect. This 2022 law requires most fuel retailers to offer E15 from at least one fueling position, unless they qualify for an exemption due to very old equipment or small-retailer status. As retailers prepare to comply, many have utilized the state's Renewable Fuels Infrastructure Program, which provides cost share grant funding, to help finance necessary upgrades. Notably, many of these projects are being completed for less than \$10,000, demonstrating that the cost of ensuring compatibility with E15 is reasonable. Iowa's experience should give California confidence that E15 can be integrated into existing retail infrastructure without undue disruption or cost to fuel retailers.

Streamlining the sale of E15 would provide California consumers with a cleaner burning, more affordable, domestically produced fuel option — one that has already been widely adopted and proven effective, economical, and reliable in Iowa and many other states. This step would align California with the growing number of states that have successfully incorporated E15 into their fuel supply.

Thank you for the opportunity to provide input. I encourage CARB to embrace the cost-saving benefits of American-made E15 as it works to expedite the availability of this more affordable fuel option for Californians. If my office can be helpful in any way as you move forward, please don't hesitate to reach out.

Sincerely,

Mike Naig
Iowa Secretary of Agriculture