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America's Ethanol Supporters

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September 15, 2022

Ann Carlson
Acting Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590
Via Regulations.gov
Docket ID: NHTSA-2022-0075

RE: Notice of Intent to Prepare an Environmental Impact Statement for Model Years 2027 and Beyond Corporate Average Fuel Economy Standards and Model Years 2029 and Beyond Heavy-Duty Pickup Trucks and Vans Vehicle Fuel Efficiency Improvement Program Standards

Dear Ms. Carlson:

Thank you for the opportunity to comment on the National Highway Traffic Safety Administration's (NHTSA) notice of intent to prepare an environmental impact statement for model years 2027 and beyond corporate average fuel economy standards (CAFE). Growth Energy is the world's largest association of biofuel producers, representing 89 U.S. plants that each year produce more than 8 billion gallons of renewable fuel; 105 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify its energy portfolio in order to grow more jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuels for consumers.

We appreciate NHTSA's work to prepare a draft environmental impact statement and request for comments. Fuels and vehicles together form a system, and it is crucial for NHTSA and other agencies to consider the important role of fuel in addressing future fuel economy standards and reductions of greenhouse gas emissions. Specifically, liquid fuels will continue to play a vital role in the transportation sector for decades to come, even as alternative technologies flourish. As such, it is imperative to consider the vital role that environmentally sustainable fuel options such as bioethanol will play in reducing greenhouse gas emissions, improving engine performance, improving energy security, promoting environmental justice, and cutting consumer costs from the current and future vehicle fleet.

As we have continued to advocate for, a primary solution for improving the environmental profile of the liquid fuel supply is the promotion of additional use of bioethanol from starch and cellulosic sources. According to recent data from Environmental Health and Engineering, today's bioethanol reduces greenhouse gas emissions (GHG) by an average of 46 percent compared to gasoline and can provide even further GHG reductions with additional readily available technologies.[1] In the existing light duty fleet, higher bioethanol blends can be immediately deployed to achieve immediate GHG reductions, reduce harmful air toxics, and reduce consumer costs at the pump.

Bioethanol's other environmental benefits are also noteworthy. for example, the University of California Riverside has concluded that the use of more ethanol and ethanol-blended fuel reduces air toxics such as carbon monoxide, benzene, and other harmful particulates.[2] To fully realize these and other important air quality benefits, there needs to be a clear policy with a firm future for the role and growth of cleaner-burning, affordable bioethanol fuels.

NHTSA should evaluate the benefits of bioethanol – a cost-effective fuel in widespread use across the country capable of additional significant growth in use and benefits – in light of the statutory factors NHTSA must consider when establishing fuel economy standards. See 49 U.S.C. § 32902(f) and past NHTSA interpretations of the factors identified therein.

Since 2012, Growth Energy has provided comments to NHTSA, the U.S. Environmental Protection Agency, and the California Air Resources Board, among others, detailing how higher bioethanol blends such as E15, E30, and E85 can help NHTSA and EPA achieve their ambitious goals. Our comments contain detailed regulatory considerations for the use of higher octane, bioethanol blends including use of E15 in the current fleet, expansion of flex-fuel vehicles in conjunction with the use of E85 (which can include hybrid and plug-in hybrid models, and full-sized pickup trucks), and the development of a high-octane, midlevel ethanol blend such as E30 for use in the future fleet. We urge you to consider our previous comments in detail and stand ready to work with you to improve our nation's fuel quality to address future fuel economy standards.

Thank you in advance for your consideration.

Sincerely,

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy

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[1] Environmental Research Letters: Carbon intensity of corn ethanol in the United States: state of the science (iop.org)
[2] University of California Riverside: https://fixourfuel.com/wp-content/uploads/2018/04/UC-Riverside-Study.pdf; California Air Resources Board: https://ww2.arb.ca.gov/sites/default/files/2022-07/E15_Final_Report_7-14-22_0.pdf