Growth Energy™
Expanding America's Bioeconomy

September 22, 2025

VIA REGULATIONS.GOV

Mr. Lee Zeldin, Administrator
U.S. Environmental Protection Agency
Office of the Administrator, Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, Docket ID No. EPA-HQ-OAR-2025-0194

Dear Mr. Zeldin,

Growth Energy is the nation's largest association of biofuel producers, representing 97 U.S. plants that each year produce more than 9.5 billion gallons of low-carbon, renewable fuel; 131 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Our members are critical to the supply of biofuel in the United States. Our industry is poised to assist the administration's energy goals by providing low-cost, innovative, and American-made fuel as we remain committed to helping our country diversify its energy portfolio and provide consumers with better and more affordable choices at the fuel pump.

Growth Energy appreciates the administration's continuing support of the biofuels industry and recognition of its vital role in ensuring American energy dominance. Renewable liquid fuels, such as ethanol, help our country increase its energy security and improve the environment, all while reducing consumer costs. Liquid fuels will continue to play a dominant role in the transportation sector now and for decades to come, and EPA was right to recognize that our nation should not put the thumb on the scale on – nor be solely dependent on – only one vehicle technology.

U.S. ethanol from corn and sorghum is a readily available and affordable means to broaden our domestic fuel supply while providing considerable benefits to consumers, our rural economy, and our environment. Today, ethanol represents more than 10 percent of our nation's gasoline supply and is poised to do much more with blends such as E15, which is approved for all 2001 and newer vehicles, as well as E85 in flex-fuel vehicles. Indeed, on average, E15 provides $0.10 – $0.15 savings to consumers relative to traditional regular unleaded gasoline.

Ethanol's environmental benefits with respect to vehicle emissions, unrelated to GHGs, are well-established. To begin with, ethanol boosts octane in fuel without the harmful impacts of alternative octane-boosting fuel additives such as methyl tert-butyl ether (MTBE), lead, and

aromatics including benzene, toluene, ethylbenzene, and xylene (BTEX) or olefins. Indeed, the level of aromatics in fuel decreases by about seven percent for every 10 percent by volume increase in ethanol content.[1] Decreasing aromatics in fuel has direct impacts on tailpipe emissions, with higher-ethanol fuels resulting in lower emissions of black carbon (BC), particle number (PN), BTEX, and olefins.[2] Using higher blends of ethanol also reduces total hydrocarbon (THC), carbon monoxide (CO), and particulate matter (PM) emissions. For PM emissions in particular, recent studies have demonstrated substantial benefits from higher blends of ethanol in fuel.[3] Vehicles and fuels work as a system, and innovations in vehicle technology, coupled with use of higher blends of biofuels like ethanol can go a long way to reducing the recognized, local environmental harms associated with these pollutants.

With a stable regulatory landscape based on recognized science, and with access to drivers without needless market barriers, the biofuels industry can deliver renewable, low-cost, and high-performing fuel solutions that provide environmental and economic benefits now and well into the future. To achieve these important benefits, we urge the EPA to provide strong and clear policy direction to encourage the adoption of home-grown, renewable fuel blends, including the following:

1. EPA should take action to remove barriers and encourage the use of blends such as E15 and E85 in today's vehicle fleet.

2. EPA should consider a higher octane fuel requirement. Higher octane fuels give automakers greater flexibility in engine efficiency.

3. EPA should approve a high octane, midlevel ethanol fuel for vehicle certification such as the 100 RON, E30 that Growth Energy first proposed and should also work with Congress to consider solutions from the Next Generation Fuels Act to further the use of high-octane fuels.

4. EPA and NHTSA should work together to re-establish appropriate credit to automakers for the production of flex-fuel vehicles, such as through Section 202 of the Clean Air Act, which could be used to provide credits to manufacturers who create engines and technologies that facilitate the use of higher blends of ethanol and other fuels.

5. EPA should work quickly to finalize its RFS proposal for 2026 and 2027, which should include 100 percent reallocation of 2023-2025 small refinery exemptions

[1] Kazemiparkouhi et al., *Comprehensive US database and model for ethanol blend effects on regulated tailpipe emissions*. 812 Science of The Total Environment 151426, (Mar. 2022).
[2] MacIntosh, et al., *Response to Proposed Renewable Fuel Standard (RFS) Program Standards for 2023–2025*, Environmental Health & Engineering (Feb. 10, 2023).
[3] *See* Karavalakis, Durbin, & Tang, Final Report, *Comparison of Exhaust Emissions Between E10 CaRFG and Splash Blended E15*, Prepared for: California Air Resources Board (CARB), Growth Energy Inc./Renewable Fuels Association (RFA), and USCAR (Jan. 2022).

(SREs), as well as finalize its proposal to broaden use of existing fuel infrastructure for E15.

6. Finally, we greatly appreciate EPA's work to provide emergency RVP waivers for E15 this summer, and we urge EPA to work with Congress on a permanent legislative solution for the year-round sale of higher ethanol blends.

Thank you again for your staunch support of the biofuels industry and recognition of the role that our producers and farmers play in providing demonstrated, affordable, and effective energy solutions.

Sincerely,

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy