

May 7, 2026

Re: Environmental Opposition to E15 Bill

Dear Representative:

The undersigned organizations write to express strong opposition to proposals advancing so-called “year-round E15” legislation, which would effectively override key provisions of the Clean Air Act by permitting gasoline blended with 15 percent ethanol to be sold throughout the year—an increase from the common 10 percent blend. Given prior indications of executive support for E15, which could then mandate it, enactment of this legal change would likely drive a 50% substantial expansion in ethanol use. Such a shift would require dedicating vast additional acreage to ethanol—exceeding half the size of Indiana—with serious consequences for our climate, natural resources, wildlife, and consumers.

**Climate Impacts.** When Congress enacted the Renewable Fuel Standard in 2007, it required that qualifying biofuels achieve reductions in greenhouse gas emissions. However, a growing body of scientific evidence now indicates that biofuels derived from food and feed crops probably result in higher emissions than conventional fossil fuels. This emerging science led the European Union, which had adopted large biofuel targets, to place much lower caps on crop-based biofuels. Similarly, the U.S. Environmental Protection Agency’s Science Advisory Board reported in 2023 that recent estimates of corn ethanol emissions exceed those of gasoline.<sup>1</sup> Reflecting these findings, even as the EPA increased biofuel requirements at the direction of the Trump Administration, it declined to conclude that food-based biofuels reduce emissions, even when combined with additional lower-emission biofuels derived from waste.

The emissions associated with corn ethanol stem not only from fossil energy inputs during production—which offset much of its purported benefit—but also from land-use changes. As cropland expands to replace food production diverted to fuel, forests and grasslands are converted, releasing significant stores of carbon.<sup>2</sup> Globally, converting land for corn ethanol production typically releases roughly twice the carbon saved from reduced gasoline tailpipe emissions over a 30-year period.<sup>3</sup> These dynamics contribute to agricultural expansion, which accounts for approximately 10 percent of global greenhouse gas emissions.<sup>4</sup> In a world where agricultural yield growth is not keeping pace with rising food demands, increasing biofuels requires either increasing hunger<sup>5</sup> or exacerbating emissions—neither of which is acceptable.

**Other Environmental Consequences.** Beyond climate concerns, crop-based biofuels are associated with a range of additional environmental harms. These include heightened water pollution, increased strain on limited water supplies, and the conversion of millions of acres of valuable wildlife habitat into cropland.

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<sup>1</sup> [Letter](#) to Michael Regan from EPA Science Advisory Board, “Commentary on the Volume Requirements for 2023 and Beyond under the Renewable Fuel Standard Program” (RIN 2060-AV14) (September 29, 2023).

<sup>2</sup> “Environmental outcomes of the US Renewable Fuel Standard.” *Proc. Natl. Acad. Sci. U.S.A.* 119(9) (2022); “Choices in Land Representation Materially Affect Modeled Biofuel Carbon Intensity Estimates.” *Journal of Cleaner Production* 349 (May 2022): 131477.

<sup>3</sup> “Assessing the Efficiency of Changes in Land Use for Mitigating Climate Change.” *Nature* 564: 249 (2018). This calculation fully credits ethanol with feed by-products.

<sup>4</sup> “Global Carbon Budget 2021.” *Earth System Science Data* 14, 1917-2005 (2022).

<sup>5</sup> The land use and biofuel model favored by the biofuel industry estimates low land use change in part because it estimates that roughly half of the calories are not replaced because higher crop prices lead to reduced food consumption. “Do Biofuel Policies Seek to Cut Emissions by Cutting Food?” *Science* 347:1420-22 (2015).

Such impacts have been documented extensively in the scientific literature<sup>6</sup> and acknowledged by federal agencies.<sup>7</sup>

**Economic Costs and Limited Energy Benefits.** The economic implications of expanding E15 are also significant. The EPA has estimated that even a more modest increase in biofuel use would impose approximately \$41 billion in additional fuel and food costs over a three-year period—outweighing estimated energy security benefits 80-fold.<sup>8</sup> These costs include an estimated \$24 billion in higher fuel costs, and \$17 billion in higher food prices, translating to roughly \$50 annually in increased household food costs per year. Contrary to claims that ethanol lowers fuel costs, production expenses for corn ethanol typically exceed those of gasoline, except during periods of unusually high oil prices—and even then, ethanol prices tend to rise in tandem with global energy markets. At a time when American families are already confronting elevated costs, year-round E15 would impose additional burdens both at the pump and at the grocery store.

**Distributional Effects.** While EPA has found biofuel policies transfer billions of dollars from consumers to the agricultural sector, the benefits are unevenly distributed. Rising crop prices are quickly reflected in higher land values and rents. Over the past two decades, inflation-adjusted cropland values in states like Iowa have increased by 250%,<sup>9</sup> in part due to biofuel demand. Because a majority of farmland in the Corn Belt is leased<sup>10</sup>—and nearly 80% of that land is owned by those who have never farmed—most of the financial gain accrues to investors rather than working farmers.<sup>11</sup>

For these reasons, we respectfully urge you to oppose efforts to expand year-round E15 and instead support more effective, sustainable approaches to energy and transportation policy. We should not commit additional land, resources, or taxpayer dollars to policies that undermine our climate goals, strain our natural systems, and increase costs for American families.

Sincerely,

World Resources Institute<sup>12</sup>  
Sierra Club  
Earthjustice Action  
Waterkeeper Alliance  
Mighty Earth  
Clean Wisconsin  
Kentucky Waterways Alliance  
Wisconsin's Green Fire, Inc.

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<sup>6</sup> “Environmental outcomes of the US Renewable Fuel Standard.” *Proc. Natl. Acad. Sci. U.S.A.* 119(9) (2022); “Cropland Expansion in the United States Produces Marginal Yields at High Costs to Wildlife.” *Nature Communications* 11:1 (2020); “US Agricultural Policy, Land Use Change, and Biofuels: Are We Driving Our Way to the next Dust Bowl?” *Environmental Research Letters* 10, no. 5 (2015).

<sup>7</sup> EPA, “[Renewable Fuel Standard \(RFS\) Program](#): Standards for 2023–2025 and Other Changes, Regulatory Impact Analysis” (June 2023).

<sup>8</sup> EPA, “Renewable Fuel Standard (RFS) Program: Standards for 2023–2025 and Other Changes, Regulatory Impact Analysis” (June 2023), p. 369 for estimates of food costs, p. v for estimates of energy costs, and p. vi for estimates of energy security benefits.

<sup>9</sup> USDA, [Iowa Farmland Rental Rates](#) 1994-2025 (accessed May 4, 2026).

<sup>10</sup> USDA National Agricultural Statistics Service's 2022 [Census of Agriculture](#).

<sup>11</sup> “[Millions Of Acres of U.S. Farmland Rented](#).” Farms.com (March 13, 2026).

<sup>12</sup> For further information, contact Janet Ranganathan, Managing Director, World Resources Institute ([janet.ranganathan@wri.org](mailto:janet.ranganathan@wri.org)).