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GrowthEnergy.org

April 28, 2022

Joel Creswell
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503
Via online submission

RE: Comments on the WA-GREET Lookup Table Values for Biofuels

Dear Mr. Creswell:

Thank you for the opportunity to comment on the Department's look-up table in conjunction with the draft WA-GREET model in development for the state's clean fuel standard. 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; 92 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 our energy portfolio in order to grow more green energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuels for consumers.

We sincerely appreciate the Department's attention and hard work to improve air quality and to reshape Washington's fuel mix to make it more sustainable. This objective is a central driver for our industry, and we look forward to continuing our work with the Department and the state of Washington on our common goals as you move ahead to further develop the clean fuel standard.

As we have discussed multiple times during the previous stakeholder meetings, we continue to urge the Department to review the latest science with respect to lifecycle emissions modeling of bioethanol that shows a nearly 50 percent decrease in greenhouse gas emissions. Even still, with readily available technologies, our industry is poised to get even further GHG reductions. Related, the latest science from Argonne National Laboratory, the U.S. Department of Agriculture, Oregon Department of Environmental Quality, and Environmental Health and Engineering among others continues to show low and decreasing values for indirect land use change (ILUC). While we believe lower ILUC values could be considered, we were glad to see that the Department's contractor, Lifecycle Associates, put a value of 7.6 g/MJ for ILUC for use in the forthcoming model for WA-GREET which was presented to stakeholders in March.

Unfortunately, we were puzzled to see that the draft look-up tables included the much higher penalty for ILUC of 19.8 g/MJ rather than reflecting the latest science and examination of biofuels. Unjustified use of higher ILUC penalties holds back the potential of further GHG and other emission reductions through immediately available higher bioethanol blends such as E15.

We hope that the Department will further clarify the more updated ILUC estimates in line with Argonne National Laboratory and Oregon as it moves to finalize the WA-GREET model.

Thank you for the opportunity to comment and in advance for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley".

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy