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GrowthEnergy.org

July 15, 2022

Joshua Grice
Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503
Via online submission

RE: Comments on Proposed Rulemaking - Chapter 173-446 WAC, Climate Commitment Act Program

Dear Mr. Grice:

Thank you for the opportunity to comment on the Department's proposal to establish a greenhouse gas emissions cap and allowance trading market or "cap and invest" program. 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; 103 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 appreciate the Department's efforts to reduce Washington's greenhouse gas (GHG) emissions. Our industry represents the largest volume of accessible, low-carbon biofuels meant to achieve the objectives of the Department and the State of Washington.

While we have been primarily involved in the Department's Clean Fuel Standard, we do wish to raise some questions about this proposal as it relates to bioethanol. Specifically, the program does contain an exemption for biofuels: it is limited to only those "fuels derived from biomass that have at least 40 percent lower GHG emissions based on a full life-cycle analysis when compared to petroleum fuels for which biofuels are capable as serving as a substitute." We believe that this definition may be too restrictive and could prohibit the use of sizeable volumes of lower-carbon bioethanol that could generate substantial GHG emission reductions for Washington and lower the state's dependence on fossil fuels. Additionally, as the Clean Fuel Standard's lifecycle emissions model has not yet been completed, it is unclear what lifecycle analysis would be used to measure the 40 percent reduction compared to petroleum fuels. The

Department should clarify its definition and exemption to maximize the benefits of low-carbon biofuels like bioethanol to reduce GHG emissions.

Related, the Department, as part of its Clean Fuel Standard, has not yet finalized its "WA-GREET" model. It is unclear whether this will be the tool used to measure the 40 percent reduction for the exemption. Nevertheless, as we have discussed with the Department during stakeholder meetings on the development of its Clean Fuel Standard, 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. 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). We understand the Department is selecting between Oregon's value of 7.6 g/MJ for ILUC and California's much higher ILUC value of 19.8 g/MJ. This determination will have tremendous implications for not only the Clean Fuel Program, but for the success of Washington's Cap and Invest Program as well.

We strongly urge the Department to clarify its definition for its biofuel exemption to maximize the use of bioethanol to reduce greenhouse gas emissions. Additionally, if the intent is to use WA-GREET for the lifecycle analysis of fuels to be exempt in the Cap and Invest program, we urge the Department to coordinate to finalize and publicize the model as soon as possible.

We would be happy to further discuss the role of higher bioethanol blends in further GHG reductions.

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