



HEADQUARTERS
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October 19, 2022

Adam Saul
Washington Department of Ecology
Air Quality Program
PO Box 47600
Olympia, WA 98504-7600
Submitted via email to: adam.saul@ecy.wa.gov

RE: POET Comments in Response to Proposed Clean Vehicles Program Rule

Dear Mr. Saul:

POET, the world's largest producer of biofuels, appreciates this opportunity to comment on the Department of Ecology (Ecology) Proposed Rulemaking, "Clean Vehicles Program" (CVP).¹ The CVP regulations will seek to reduce criteria and greenhouse gas (GHG) emissions from new light- and medium-duty vehicles and transition all new light-duty vehicle sales in Washington to zero-emission by 2035. The proposed regulation complies with Washington legislation which requires GHG emissions reductions of 95% below 1990 levels by 2050 and achieve net-zero emissions across all levels of government and economic sectors.² Low-carbon liquid fuels align with and complement this goal, as well as the strategy toward greater electrification. The below comments highlight the important and ongoing role for biofuels as the state works toward achieving transportation emissions reductions.

About POET

[POET's](#) vision is to create a world in sync with nature. As the world's largest producer of biofuels and a global leader in sustainable bioproducts, POET creates plant-based alternatives to fossil fuels that utilize the power of agriculture and cultivate opportunities for America's farm families. Founded in 1987 and headquartered in Sioux Falls, POET operates 34 bioprocessing facilities across eight states and employs more than 2,200 team members. With a suite of bioproducts including Dakota Gold and NexPro feed, Voilà corn oil, purified alcohol, renewable CO₂ and JIVE asphalt rejuvenator, POET is committed to innovation and advancing solutions to some of the world's most pressing challenges. POET holds more than 80 patents and continues to break new ground in biotechnology, yielding ever-cleaner and more efficient renewable energy. In 2021, POET released its inaugural [Sustainability Report](#) pledging carbon neutrality by 2050.

¹ Clean Vehicles Program, WSR 22-18-103 (to be codified at WAC Ch. 173-423).

² RWC Title 70A Ch. 70A.45, Sec. 70A.45.020 (2022).

Renewable clean-burning biofuels like those POET produces cut carbon emissions by an average of 46 percent compared to gasoline, which can have an enormous impact on GHG emissions. POET is continuing to innovate to further improve on the GHG emissions benefits of its products. For example, we partnered with the Farmers Business Network on an initiative called Gradable to track and score the carbon footprint of farmers' production methods. The technology tracks emissions at the farm level, including fertilizer use and sustainable farming practices like cover crops. The Gradable program positions the biofuels industry and growers to supply low-carbon fuel markets with ever-cleaner renewable fuels as an important component of Washington's efforts to decarbonize transportation and other sectors.

Proposed Clean Vehicles Program Rule

Washington has adopted California's Low Emission Vehicle (LEV) program which requires that vehicles meet certain emissions standards. The LEV program includes a Zero Emission Vehicle (ZEV) mandate requiring automobile manufacturers to sell a number of ZEVs into Washington. The program awards credits based on the ZEVs sold into Washington and requires each automaker to maintain a number of credits based on non-EV sales into the state. This CVP rulemaking proposes to adopt California's Advanced Clean Cars II rule, which would transition all new light-duty vehicle sales in Washington to zero-emission vehicles by 2035.

POET Comments

POET supports Washington's efforts to reduce GHG emissions and other harmful air pollution. However, POET encourages Washington to examine lifecycle as opposed to only tailpipe emissions, which will allow the state to identify more opportunities for GHG reductions and adopt policies that encourage a full range of technologies and practices to achieve those reductions.

The CVP's goal is to help Washington reduce air pollution and transportation-related GHG emissions. However, the CVP's focus on ZEVs ignores the lifecycle emissions associated with transportation. A lifecycle approach looks beyond one isolated aspect of a fuel's lifecycle (like tailpipe emissions) and instead considers the total GHG emissions over the lifecycle of the fuel. The CVP does not fully acknowledge the potential for biofuels to reduce lifecycle transportation emissions.

Biofuels deliver significant and immediate GHG benefits as alternatives to petroleum. As noted above, a recent analysis from respected researchers shows that corn bioethanol has a 46 percent average lower carbon intensity than gasoline. As highlighted in the analysis, innovations across the biofuel production lifecycle have resulted in increasingly cleaner liquid biofuels.³ These innovations will only continue to further drive down the carbon intensity of conventional and advanced biofuels. Enhanced farming practices, increased use of renewable power, and CO₂ sequestration are only a few of the many actions that are well within reach and can have a dramatic impact on GHG reductions from biofuel production. Applied across the Washington light- and medium-duty fleets, the emission benefits of displacing fossil fuels with clean burning

³ Sully, Melissa *et al.*, *Carbon intensity of corn ethanol in the United States: state of the science*, 2021 Environ. Res. Lett 16 043001, 4 (2021), <https://iopscience.iop.org/article/10.1088/1748-9326/abde08>.

bioethanol are significant. Renewable fuel blends, like E15, could also provide meaningful cost savings to Washington drivers.⁴

Washington will have to overcome many challenges to meet its electric vehicles goals, ranging from affordability concerns to infrastructure needs and battery-sourcing limitations. Recognizing these challenges, POET urges Ecology to examine and incorporate low-carbon, affordable liquid fuels as part of the strategy to reduce emissions. For example, as Ecology evaluates new requirements for plug-in hybrid electric vehicles (PHEV) in this proceeding, the agency should consider the development of a regulatory approach to ensure that PHEVs in Washington are Flex Fuel enabled as soon as possible as a key initial step toward ensuring that Washington's entire passenger vehicle fleet is equipped to be powered by the cleanest, lowest carbon liquid fuels available.

To meet and maintain climate goals in the future, it is imperative that Ecology start planning now to achieve the maximum amount of emissions reductions from cars and trucks by developing rules that will promote the use of increasingly clean liquid biofuels. In addition to electrification, Ecology should ensure that the state considers, supports, and takes advantage of all approaches to decarbonizing transportation to meet the state's climate and air quality goals.

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POET applauds Ecology's efforts to reduce transportation emissions. We appreciate Ecology's consideration of these comments and look forward to engaging in a productive dialogue with the agency on the role biofuels play in meeting the state's climate goals. If you have any questions, please contact me at Matt.Haynie@POET.COM or (202) 756-5604.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt", written in a cursive style.

Matthew Haynie
Senior Regulatory Counsel
POET, LLC

⁴ *Consumer Savings from Year-Round Nationwide E15 Use*, ABF ECONOMICS (Oct. 13, 2022), <https://growthenergy.org/wp-content/uploads/2022/10/ABF-E15-Consumer-Savings-101322.pdf>.