Global Clean Energy

June 7, 2024

Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

To Whom It May Concern:

Thank you for your continued dedication to enhancing air quality in Washington through the proposed updates to the Clean Fuel Standard (CFS) program. Our company, Global Clean Energy, stands ready to assist the Department of Ecology in reducing the carbon intensity of transportation fuels used in the Evergreen State. As a renewable fuel innovator, we work tirelessly to ensure that the renewable fuels we produce have the lowest possible carbon intensity. What sets us apart from others in the renewable energy space is our focus on producing ultra-low carbon renewable fuels using *camelina sativa* (camelina), a crop that does not require land use change.

Unlike other renewable fuel feedstocks, camelina is nonfood. Camelina is quick to mature, is tolerant to drought, promotes biodiversity, sequesters carbon as it is grown, and provides soil health benefits like those of cover crops. Importantly, camelina does not displace food crops when grown. Instead, it grows on existing farmland during the fallow period between crop cycles, providing a new revenue source to farmers and rural agricultural communities while also strengthening our domestic energy supply. Given these unique traits, camelina has the potential to be the lowest carbon intense renewable fuel feedstock crop on the market.

Labeled as an "Intermediate Crop," camelina falls under a new classification for biofuel and renewable fuel feedstocks. Intermediate Crops act as harvestable cover crops that can reach maturity during an idle or fallow period on existing farmland, which does not cause land use change or impact food supply. Intermediate Crops like camelina can help Washington, as well as our nation, reach renewable fuel and sustainable aviation fuel (SAF) goals responsibly through biomass.

As you endeavor to develop draft rule language, and the corresponding environmental justice assessment, we urge you to further encourage the production of low carbon intensity renewable fuels and SAFs by incentivizing the use of Intermediate Crops as feedstocks. Such a move would also align Washington with California's Low Carbon Fuel Standard (LCFS) program requirements. Global Clean Energy was granted a first-of-its-kind LCFS pathway for our patented camelina varieties in 2015.

We encourage you to recognize the importance of emerging crops like camelina within your rulemaking process. By incentivizing the further adoption of Intermediate Crops among growers and renewable fuel producers, we can help ensure land use change is prevented, soil health is protected, and renewable fuel and SAF feedstock demand can be met sustainably.

As camelina is a relatively new crop, education and incentives are vital to ensure continued adoption and future success. Recognizing that newer biofuel feedstocks lack the resources of traditional commodities like soy or corn, we recommend that any accounting rules adopted in your rule should not place Intermediate Crops, like camelina, at a financial disadvantage as they establish themselves within the market.

As experts in this emerging field of Intermediate Crops, we stand ready to work with Department of Ecology staff and others to lend data and provide guidance in the development of an accounting mechanism that addresses greenhouse gas and air pollution emissions associated with feedstock production pathways.

We look forward to promoting enhanced air quality in the Evergreen State and to working together to ensure Intermediate Crops like camelina are supported while Washington's Clean Fuel Standard program rules are developed. Thank you for taking the time to consider our comments.

Sincerely,

Amanda Parsons DeRosier
Vice President of Public Affairs and Investor Relations
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