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Lauren Sanner
Department of Ecology
Climate Pollution Reduction Program
PO Box 47600
Olympia, WA 98504-7600

Submitted electronically via: https://ecology.commentinput.com/?id=KYsWZej7h

RE: POET COMMENTS ON WASHINGTON'S DEPARTMENT OF ECOLOGY'S WA GREET 4.0 MODEL UPDATES AND TRANSITION WORKSHOP

Dear Ms. Sanner:

POET appreciates the opportunity to participate in Washington's Department of Ecology's ("Ecology") Clean Fuel Standard ("CFS") Rulemaking and to provide comments on the "WA GREET 4.0 Model Updates and Transition" workshop held October 14 ("WA GREET Workshop").[1] POET has participated actively in past rulemakings through the submission of comments and engagements with Ecology's staff, and POET looks forward to continuing its positive relationship with Ecology throughout the new CFS rulemaking process.

In the WA GREET Workshop, Ecology discussed four updates to the WA-GREET4.0 model, in part based on updates to the CA-GREET4.0 model.[2] One of these proposed updates would be to the existing Tier 1 calculator for corn and sorghum ethanol.[3] POET urges Ecology to consider incorporating climate-smart agricultural ("CSA") practices into the WA-GREET4.0 and believes the amendments to the Tier 1 calculator would be a natural vehicle for this inclusion. Ecology could add an optional feedstock CI input allowing pathway applicants to substitute a verified, FD-CIC-derived CI for default corn or sorghum farming emissions. With the availability of the federal model discussed below, Ecology has ample time to make this addition within the current rulemaking.

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[1] WA GREET 4.0 Model Updates and Transition Workshop, Clean Fuel Standard Rulemaking, Climate Pollution Reduction Program (October 14, 2026) ("WA GREET Workshop Presentation"), *available at*: https://ecology.wa.gov/getattachment/60b0f7a3-b5f5-4edd-952d-bf83e35f2256/10-14-26-CFS-Rulemaking-GREET-4-0-Workshop-FOR-PDF.pdf.
[2] *Id.* at slide 6.
[3] *Id.*

As POET identified in its previous comment submitted on September 29, 2026, USDA recently published its final Technical Guidelines and Feedstock Carbon Intensity Calculator ("FD-CIC").[4] The FD-CIC has since been incorporated into the September 2026 version of the 45ZCF-GREET model, enabling producers to claim reductions associated with cover crops, tillage practices, nitrification inhibitors, and manure application for corn, sorghum, soybeans, and spring canola.[5] Rather than base the carbon-emissions reduction estimates on assumptions about average or typical farming practices across the country, USDA worked with academic institutions and experts to develop the USDA FD-CIC. Because the effectiveness of nutrient management and low-carbon practices varies based on region, USDA's underlying analysis relied on data from the USDA Natural Resource Conservation Service's 278 Major Land Resources Areas ("MLRAs"). Using the data from the analysis of the MLRAs, along with a 30-year modeling timeframe, the USDA FD-CIC determines the impact of nutrient management and low-carbon practices based on the farmer's location and inputs.[6] USDA provided early access to the beta version of the model in January 2025 and used public feedback and significant additional analysis to prepare the final model. The final version of the USDA FD-CIC is being put into practice today as part of the 45ZCF-GREET model and can easily be incorporated into other clean fuels programs.

In its responses to comments in the previous CFS rulemaking, Ecology explained it was paying attention to CSA updates but noted what it viewed as a significant burden associated with the administration, quantification, and verification of emissions reductions.[7] The Technical Guidelines address all of these concerns. The stated purpose of the guidelines "is to establish technical guidelines for quantifying, reporting, and verifying the carbon intensity of agricultural biofuel feedstock commodity crops grown in the United States."[8] The guidelines include detailed regulations on quantification of field-level crop-specific CIs, recordkeeping and reporting requirements throughout the entire chain of custody, audit and verification requirements, and the specifics for nutrient management and low-carbon practices.[9] Moreover, the regulations specifically require that field-level CI quantification is to be done using the FD-CIC developed by USDA, ensuring a consistent, nationwide CI approach.[10] Because the Technical Guidelines already supply the quantification tool, practice standards, chain-of-custody requirements, and verifier accreditation standards, Ecology would need to make only limited, program-specific choices, such as how pathway holders report FD-CIC-derived feedstock CIs and how that reporting fits within the third-party verification program Ecology will begin implementing in 2028.

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[4] U.S. Department of Agriculture, Technical Guidelines for the Production of Regenerative Agricultural Biofuel Feedstocks, 91 Fed. Reg. 39334 (June 29, 2026) (codified at 7 CFR § 2100).
[5] The USDA Feedstock Carbon Intensity Calculator has been incorporated into the September 2026 version of the 45ZCF-GREET model. *See* I.R.S. Notice 2026-53 (Sept. 8, 2026).
[6] *See* 91 Fed. Reg. 39334 at 39335.
[7] https://apps.ecology.wa.gov/publications/documents/2514090.pdf at pp. 96-97.
[8] 7 CFR § 2100.001.
[9] 7 CFR § 2100.010-064.
[10] 7 CFR § 2100.020.

USDA's pioneering work dramatically reduces the administrative burden of incorporating CSA into a clean fuels program, resolving the objection most frequently raised against crediting CSA emissions reductions into a clean fuels program. Ecology need not build a quantification or verification system of its own. It may adopt into the WA-GREET4.0 model the FD-CIC—a tool developed across two federal administrations of both political parties, maintained by the federal government, and in operation today. The USDA regulations include thorough recordkeeping and auditing requirements, ensuring monitoring and verification of on-farm emissions reductions and identifying protocols for proper chain-of-custody. Ecology need only adopt what USDA, through years of research and work, has already developed. If Washington is to succeed in the ambitious SAF goals and new CI-reduction goals required for the CFS, it will need low-CI ethanol to play a major role. And for low-CI ethanol to help achieve Washington's goals, Ecology should recognize, rather than ignore, the innovations taking place in the bioethanol industry.

POET appreciates the opportunity to comment and looks forward to working with Ecology to make the Clean Fuel Standard a continued success for Washington. If you have any questions, please contact me at Paul.Townsend@POET.com or (605) 756-5612.

Sincerely,



Paul W. Townsend
Regulatory Counsel