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GrowthEnergy.org

November 12, 2020

Will Toor  
Executive Director  
Colorado Energy Office  
1600 Broadway  
Suite 1960  
Denver, CO 80202  
Via electronic mail: [climatechange@state.co.us](mailto:climatechange@state.co.us)

RE: Colorado Greenhouse Gas Pollution Reduction Roadmap

Dear Mr. Toor:

Thank you for the opportunity to comment on the state's greenhouse gas pollution reduction roadmap. Growth Energy is the world's largest association of biofuel producers, representing 89 U.S. plants that each year produce more than 7.5 billion gallons of renewable fuel; 96 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. We currently represent the three biorefineries in Colorado: Front Range Energy, Sterling Ethanol, and Yuma Ethanol. 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 your attention and hard work to reshape Colorado's energy 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 state on our common goals as you move ahead. Specifically, liquid fuels will continue to play an important role in the transportation sector, even as alternative technologies gain attention. As such, it is imperative to look at ways to improve the availability and affordability of more environmentally friendly, sustainable fuel options that can be used in current and future vehicles.

As we have continued to advocate, a primary solution for cleaning up the liquid fuel supply is the promotion of additional use of ethanol, from starch or cellulosic sources. According to recent data from the U.S. Department of Agriculture, today's starch ethanol reduces greenhouse gas emissions (GHG) by an average of 39 percent, and with further development of cellulosic and

other technologies, biofuels are poised to do much more.<sup>1</sup> Further, higher ethanol blends like E15, a blend consisting of 15 percent ethanol, can be immediately deployed in existing vehicles to achieve immediate GHG reductions, reduce harmful air toxics, and reduce consumer costs at the pump.

Also noteworthy are ethanol's additional environmental benefits. As has been researched by the University of California, Riverside and the University of Illinois at Chicago, the use of more ethanol and ethanol-blended fuel reduces air toxics such as carbon monoxide, benzene, and other harmful particulates.<sup>2</sup> To fully realize these and other important air quality benefits, there needs to be a clear policy with a firm future for the role and growth of cleaner-burning, affordable ethanol fuels.

We urge you to develop clear policies that recognize the realities of today's fuel market and examine how homegrown biofuels can immediately contribute to achieving GHG reductions. Today, nearly all gasoline in Colorado - and across the U.S. - is blended with 10 percent ethanol. E15 has been approved for use by the U.S. Environmental Protection Agency in all passenger vehicles model year 2001 and newer, which is more than 95 percent of the vehicles on the road today. Additionally, consumers can find E15 for sale at more than 2,200 locations in 30 states, including Colorado, where there are currently 36 stations selling the fuel. The state should strongly encourage the use of higher biofuel blends such as E15, so that it can be made available to Colorado drivers to further drive down greenhouse gas emissions and help the state achieve its carbon neutrality goals.



<sup>1</sup> USDA: <https://www.usda.gov/media/press-releases/2019/04/02/usda-study-shows-significant-greenhouse-gas-benefits-ethanol>

<sup>2</sup> University of California Riverside: <https://fixourfuel.com/wp-content/uploads/2018/04/UC-Riverside-Study.pdf>; University of Illinois at Chicago: <https://grains.org/wp-content/uploads/2018/11/Complete-Study-Summary.pdf>

Additionally, the use of E85 will promote even greater reductions in GHG emissions and reductions of air toxics. We would encourage Colorado to push for policies that continue to strongly encourage and incentivize the production and use of flex-fuel vehicles, as well as continued investment in infrastructure for the expanded use of E85 in the state.

More broadly, we look forward to working as you work on your decarbonization goals. We stand ready to help ensure the role of biofuels in making Colorado's fuel mix more sustainable and help the state achieve its progressive climate goals through the expanded use of biofuels like ethanol.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley". The signature is fluid and cursive, with a large, stylized initial "C" and "B".

Chris Bliley  
Senior Vice President of Regulatory Affairs  
Growth Energy