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GrowthEnergy.org

May 15, 2023

Stephanie Potts  
Washington Department of Ecology  
P. O. Box 47600  
Olympia, WA 98504  
*Via online submission*

**RE: Comments on Proposed Cap and Invest Linkage and Biofuels**

Dear Ms. Potts:

Thank you for the opportunity to comment on the Department's discussions to link the state's "cap and invest" program with those programs in existence in California and Quebec. Growth Energy is the world's largest association of biofuel producers, representing 92 U.S. plants that each year produce 9 billion gallons of renewable fuel; 115 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 effort to reduce Washington's greenhouse gas 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.

As we outlined in our comment directly on the Cap and Invest program, we continue to be concerned about the restrictive definition of the exemption for biofuels and its impact on bioethanol. Specifically, while 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." While we appreciate the Department's discussion in the final rulemaking that "Ecology's working assumption is that all biofuels meet the 40 percent standard for past and near future years unless that verification process clearly indicates otherwise", we continue to believe that this definition does not provide enough clarity and may be too restrictive, and ultimately 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.

This issue is particularly important as the Department seeks to link the program with those in Quebec and California where biofuels are already clearly exempt.

We strongly urge the Department to clarify its definition for its biofuel exemption to maximize the use of bioethanol to reduce greenhouse gas emissions.

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,



Chris Bliley  
Senior Vice President of Regulatory Affairs  
Growth Energy