United States Senate

WASHINGTON, DC 20510

April 1, 2022

The Honorable Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Docket ID number: OAR-2021-0921

Dear Administrator Regan:

We write in response to the decision by the Environmental Protection Agency (EPA) to review the scientific methodology and modeling used in the transportation sector pursuant to the Renewable Fuel Standard (RFS) to accurately ascertain the greenhouse gas (GHG) emissions of land-based biofuels.[1] In support of this effort and the need for stakeholders to have a consistent and well-vetted standard through which all biofuels may be compared, we urge you to adopt Argonne National Lab's Greenhouse Gases, Regulated Emissions, and Energy Use in Transportation (GREET) Model. Adopting the GREET Model will not only permit the federal government to further standardize its comparison of GHG emissions for biofuels like ethanol, biodiesel, and sustainable aviation fuel, but enable over 50,000 registered GREET users to more readily compare renewable fuels to other sources of energy.[2]

As presented during the March 1, 2022, EPA workshop, the GREET Model has provided annually updated lifecycle "well-to-wheels" analysis for an expanding universe of energy sources since 1995.[3] Importantly, the GREET Model permits consistent comparison between petroleum-based fuels, natural gas systems, electric generation, and renewable fuels derived from a variety of technology pathways, accounting for the lifecycle carbon intensity of key farming inputs. We ask that EPA utilize the GREET Model as the baseline GHG determination for biofuels so that stakeholders may have the opportunity to readily compare the GHG intensity of competing energy sources and policymakers may have a fuller picture of how to decarbonize the energy and transportation sectors.

The GREET Model has been among the most widely utilized sources of GHG data, underpinning research that finds corn ethanol can currently achieve 46 percent lower lifecycle carbon intensity than gasoline. This environmental benefit will only increase as biorefining and fuel technologies improve, the agriculture sector advances operational efficiencies and produces higher yields of renewable feedstock per acre, and as biofuel operations are paired with carbon capture projects.[4] Updated and consistent GHG modeling can provide a positive feedback loop that drives

[1] https://www.govinfo.gov/content/pkg/FR-2021-12-28/pdf/2021-28079.pdf
[2] https://afdc.energy.gov/files/u/publication/ethanol-ghg-reduction-with-greet.pdf
[3] https://www.epa.gov/system/files/documents/2022-03/biofuel-ghg-model-workshop-biofuel-lifecycle-analysis-greet-model-2022-03-01.pdf
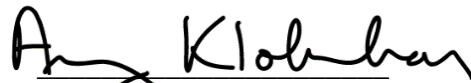[4] https://iopscience.iop.org/article/10.1088/1748-9326/abde08/pdf

continued progress to lower carbon intensity at both the farm and fuel level. From "field-to-tailpipe," the reduction of carbon intensity provided by biofuels deepens as consumers select higher blends of biofuels like E15, E30, E85, and B20 for their energy needs.
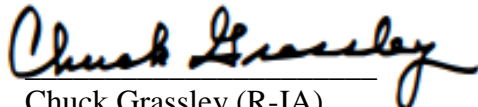
We applaud EPA for reviewing and updating its GHG modeling resources in accordance with its obligations under the RFS to ensure that accurate and reliable data can remain central to policies concerning energy consumption and reducing emissions. We hope that EPA will use the GREET Model as its primary resource for determining lifecycle GHG emissions of biofuels, which could immediately contribute to ongoing efforts to reduce energy emissions.
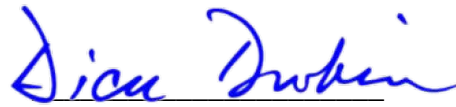
Thank you for the timely consideration of our request and your assistance to enable homegrown biofuels to serve as a solution to our nation's growing energy challenges.
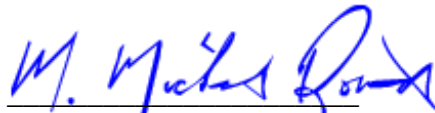
Sincerely,

John Thune (R-SD)
United States Senator

Amy Klobuchar (D-MN)
United States Senator

Chuck Grassley (R-IA)
United States Senator

Dick Durbin (D-IL)
United States Senator

M. Michael Rounds (R-SD)
United States Senator

Sherrod Brown (D-OH)
United States Senator

Joni Ernst (R-IA)
United States Senator

Tammy Duckworth (D-IL)
United States Senator

Roger Marshall, M.D. (R-KS)
United States Senator