

Congress of the United States

Washington, DC 20510

February 15, 2024

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

The Honorable Michael Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

The Honorable Jennifer Granholm
Secretary
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

The Honorable Michael Whitaker
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Re: § 40B(e)(2) GREET Model for Sustainable Aviation Fuel Lifecycle Analysis Under the Inflation Reduction Act of 2022

Dear Members of the Sustainable Aviation Fuels Lifecycle Analysis Interagency Working Group (IWG):

We write regarding the implementation of the Department of Energy's (DOE) updated Greenhouse Gases, Regulated Emissions, and Energy Use in Technologies (GREET) model for sustainable aviation fuel (SAF).

As you know, homegrown SAF has the potential to drive economic growth and create jobs across America. We recognize your recent decision to allow the GREET model to serve as a secondary model for sustainable aviation fuel as a step in the right direction. This announcement has the potential to bring us closer to scaling up domestic production of SAF as America looks to fortify its domestic energy supply and decarbonize the aviation fuels sector. Biofuels drive economic growth, create good-paying manufacturing jobs, and strengthen economies across rural America. As you continue to develop a model to determine eligibility, we ask that you take measures to permit every participant in the SAF lifecycle to appropriately participate in the carbon reduction process.

We request that you adopt the updated GREET model as your methodology for determining this eligibility as soon as possible. We also ask that, in the process of doing so, you adhere to the rigorous science on which the model is based. This will accelerate efforts to decarbonize aviation — in line with the Administration's stated goals — by accurately crediting emissions reductions from regenerative farming, climate-smart agriculture, and carbon capture and storage.

Specifically, we ask that you make the following commitments:

1. The updated GREET model must be completed and implemented by the IWG's stated deadline of March 1, 2024. Biofuel producers are eager to begin making investments in

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production capacity. If the modeling update misses this deadline, these investments will remain on hold.

2. Any proposed modifications to GREET should be subject to the normal scientific, agency, and public processes. Any modifications to the model must be governed by the latest science at the DOE's Argonne National Lab, who have been recognized as the leaders in developing models to calculate carbon life-cycle analyses.
3. Any modifications must ensure that the model will continue to accurately credit conservation practices and emissions reductions from regenerative farming as well as carbon capture and storage. Exclusion of these factors would omit critical efforts by American farmers to reduce emissions and would represent a missed opportunity to include rural America in the diversification of the aviation fuel sector.
4. Ensure that valuations of indirect land-use changes recognize the contributions of American agriculture and reward modern practices like precision agriculture that lead to higher per-acre yields.

While we recognize your ongoing work to support the production of SAF, the actions above are crucial for ensuring the long-term stability and growth of this field. We stand ready to work with you to implement the updated GREET model as soon as possible, which will unleash the full potential of domestic SAF production and ensure American farmers can fuel the future.

Thank you for your attention to this important issue.

Sincerely,



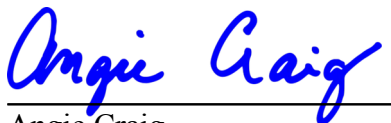
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United States Senator



John Thune
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Tammy Duckworth
United States Senator




Angie Craig
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Member of Congress

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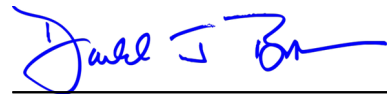
Mark Pocan
Member of Congress



Adrian Smith
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Mark Alford
Member of Congress



Don Bacon
Member of Congress



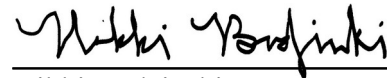
Tammy Baldwin
United States Senator



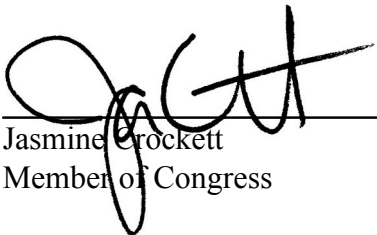
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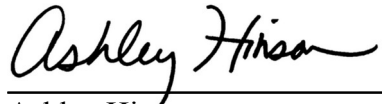
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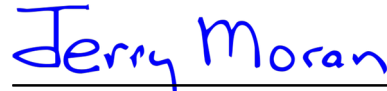
Roger Marshall, M.D.
United States Senator



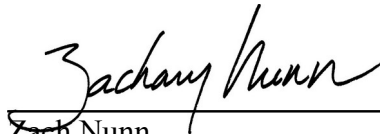
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