

# 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,



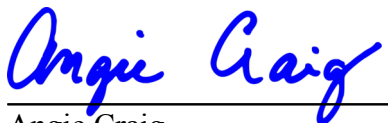
Amy Klobuchar  
United States Senator



John Thune  
United States Senator



Tammy Duckworth  
United States Senator



Angie Craig  
Member of Congress



Dusty Johnson  
Member of Congress

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Mark Pocan  
Member of Congress



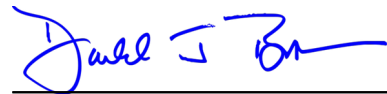
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Adrian Smith  
Member of Congress



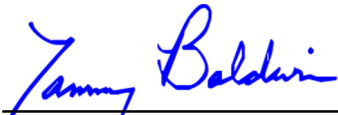
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Mark Alford  
Member of Congress



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Don Bacon  
Member of Congress



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Tammy Baldwin  
United States Senator



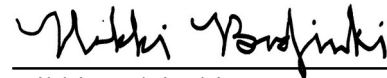
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Mike Bost  
Member of Congress



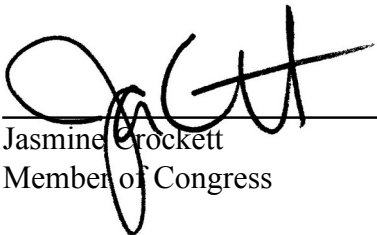
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Sherrod Brown  
United States Senator




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Nikki Budzinski  
Member of Congress



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Jasmine Crockett  
Member of Congress



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Sharice L. Davids  
Member of Congress

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Richard J. Durbin  
United States Senator



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Joni K. Ernst  
United States Senator



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Ron Estes  
Member of Congress



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Randy Feenstra  
Member of Congress



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Brad Finstad  
Member of Congress



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Deb Fischer  
United States Senator



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Michelle Fischbach  
Member of Congress



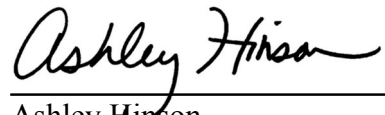
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Mike Flood  
Member of Congress



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Charles E. Grassley  
United States Senator



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Ashley Hinson  
Member of Congress

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Marcy Kaptur  
Member of Congress



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Robin L. Kelly  
Member of Congress



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Darin LaHood  
Member of Congress



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Jake LaTurner  
Member of Congress



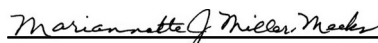
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Roger Marshall, M.D.  
United States Senator



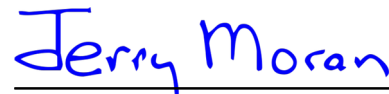
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Max L. Miller  
Member of Congress



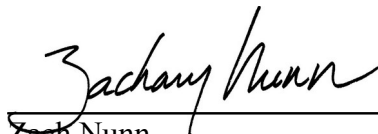
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Mariannette Miller-Meeks,  
M.D.  
Member of Congress



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Jerry Moran  
United States Senator



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Zach Nunn  
Member of Congress



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Jimmy Panetta  
Member of Congress

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Gary C. Peters  
United States Senator



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Pete Ricketts  
United States Senator



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Mike Rounds  
United States Senator



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Tina Smith  
United States Senator



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Debbie Stabenow  
United States Senator



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Elissa Slotkin  
Member of Congress



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Eric Sorensen  
Member of Congress



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Derrick Van Orden  
Member of Congress