



January 26, 2022

Department of Ecology  
State of Washington  
P.O. Box 47600  
Olympia, WA 98504-7600

**Re: Carbon intensity trajectory in Chapter 173-424 WAC, the Clean Fuel Standard**

Dear Debebe Dererie,

Thank you for the opportunity to submit joint comments on rules pertaining to the Clean Fuel Standard (Chapter 173-424 WAC). A majority of Pierce County Councilmembers were proud to support the Clean Fuel Standard alongside Port of Tacoma, Northwest Seaport Alliance, Tacoma Public Utilities, the City of Tacoma and so many other trusted organizations as it progressed through the legislature. We are now excited to see the law implemented. We know that this policy will benefit our constituents by spurring investment in a clean energy economy, protecting us from poor air quality, and helping address the devastating impacts of climate change.

It is for this reason that we write you, urging you to *draft a rule that requires a 20% reduction in carbon intensity of fuels be achieved by the earliest date allowed in the law—2034*. The law outlines a specified trajectory for the years 2023 through 2033. Beyond that, however, it is up to Ecology's discretion on how to reduce emissions intensity "to 20 percent below 2017 levels by 2038". Thus, Ecology was granted the flexibility to set a trajectory that would achieve a 20% reduction in 2034. Had the Legislature desired to restrict Ecology's discretion in this regard, it could have done so.

Implementing the strongest Clean Fuel Standard possible will result in more clean fuels investments more quickly, benefiting our economy, air, health, and climate. Pierce County has proposed a 45% reduction in greenhouse gas emissions below 2015 levels by 2030, and while we are taking steps to achieve this lofty and necessary goal, strong state policy will help us get there.

Thank you for your work on this important rule.

Best,

A handwritten signature in blue ink that reads "Ryan N. Mello".

Ryan N. Mello  
Councilmember, District 4