



the future forest company

January 21, 2022

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

RE: Rulemaking - Informal Comment Period for Chapter 173-424 WAC, Clean Fuels Program Rule

We are collectively writing to express our support for the Department of Ecology's (Ecology) swift adoption of the Clean Fuels Program (Program) rule, and to encourage Ecology to **expressly include pathways for innovative carbon removal technologies that contribute to the reduction of greenhouse gases** under the program.

This letter's signatories represent a range of interests from the emerging carbon removal ecosystem, including technology developers and leading buyers of carbon removal. Together, our companies are committed to tackling climate change. Washington is a national leader in cutting greenhouse gas emissions to prevent climate change. But achieving net zero emissions by 2050 will require both radical emissions reductions and the permanent removal of significant amounts of carbon from the atmosphere every year. However, the pipeline of available technologies capable of delivering carbon removal at this scale is simply not big enough. As Washington develops foundational policies like the Clean Fuels Program to mitigate emissions in the transportation sector, it is well-positioned to also align its policy with emerging opportunities to permanently remove carbon, accelerating the development of these innovative solutions, and strengthening the state's ability to meet its ambitious goals.

Enabling High-Quality, Technology-Neutral Carbon Removal

Carbon removal technologies are rapidly advancing. Existing policies that rely only on fossil fuel-aligned carbon capture and storage fail to recognize the breadth of cutting-edge decarbonization technologies that will ultimately be necessary to meet both Washington State's and the world's net zero goals. Ecology is well-positioned to develop a comprehensive rule that enables emerging technologies to participate in the Clean Fuels Program.

Rather than limit carbon removal to specific technology types, we encourage Ecology to define carbon removal within the Clean Fuels Program as any carbon removal that is:

1. **Durable:** Removes carbon from the environment for at least 1,000 years. A carbon emission is functionally permanent, and, therefore, any removal effort must similarly be permanent.
2. **Safe:** Legally compliant and actively engages with the public to determine and mitigate possible risks, negative externalities, and social and environmental justice concerns.
3. **Additional:** Demonstrably results in net additive carbon being removed, rather than taking credit for removal that would have occurred otherwise.
4. **Verifiable:** Uses scientifically rigorous and transparent methods for monitoring and verification, taking into account net removal using a cradle-to-grave life cycle assessment.
5. **Goal Aligned:** Approved carbon removal for the Clean Fuels Program should be defined to include only those removals that support Washington's long-term climate goals.

Justification for Carbon Removal

In passing HB 1091, Washington State correctly identified that carbon mitigation *and* carbon dioxide removal must be utilized to meet the State's climate goals. The signatories are encouraged that HB 1091 recognized the role of additional activities that reduce greenhouse gas emissions, in Section 6 stating that:

"The rules adopted under sections 3 and 4 of this act may allow the generation of credits from activities that support the reduction of greenhouse gas emissions associated with transportation in Washington," and pointing to activities including, but not limited to, carbon capture and storage and direct air capture.

We support the "broad tent" philosophy espoused here, and believe that Ecology is poised to effectuate legislative intent by ensuring that carbon dioxide removal technologies be incorporated into the Clean Fuels Program. It is imperative for the success of the Clean Fuels Program that carbon removal technologies **both directly and indirectly associated with transportation fuel production** are able to contribute to and participate in the Clean Fuels Program.

Incorporating technology-neutral carbon dioxide removal credit generation in the Clean Fuels Program will firmly establish the state as a leader in the climate space. It will also streamline alignment with California as it considers potential pathways for emerging technologies through updates to its Low Carbon Fuel Standard. Taking a technology-neutral approach avoids any unintentional preclusion of viable carbon removal projects and greatly increases the likelihood of meeting Washington's goal of net zero emissions by 2050.

In conclusion, we appreciate the opportunity to submit comments and look forward to collaborating with Ecology, Washington Tribes, and stakeholders on our proposal.

Sincerely,

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