



**PUGET SOUND
Clean Air Agency**

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April 25, 2022

Re: Department of Ecology informal public comment on the Clean Fuels Program Rule

Dear Debebe Dererie,

Thank you for the opportunity to provide comments during the informal comment period for the Clean Fuels Program.

The Puget Sound Clean Air Agency (Agency) jurisdiction covers King, Kitsap, Pierce, and Snohomish counties. These four counties are home to more than 4.1 million people—over half the state’s population.

Every day the Agency works to protect public health, improve neighborhood air quality, and reduce our region’s contribution to climate change. The Agency is committed to everyone in our jurisdiction having clean, healthy air to breathe all the time, regardless of socio-economic status or geographic location.

The Agency adopted a climate target in 2017 to reduce greenhouse gas (GHG) emissions to 1990 levels by 2020, 50% below 1990 levels by 2030, and 80% below 1990 levels by 2050. While we are not on track to meet these targets, recent comprehensive analyses such as the 6th Intergovernmental Panel on Climate Change (IPCC) assessment¹ demonstrate that even greater urgency is needed to meet these targets and beyond. Local climate impacts like increasingly common wildfire smoke events highlight the urgent need for GHG emission reductions.

The Agency has conducted several studies to identify potential ways to make progress towards our climate target. A clean fuel standard reducing carbon intensity of fuels consistently rose to the top as a key action to reduce GHG emissions from the transportation sector. A

clean fuel standard allows flexibility for regulated parties while ensuring carbon intensity reduction. Program design also ensures that equity is addressed, identifying investments in communities using electric utility credit revenues. In addition to contributing to GHG emissions, transportation emissions also contribute to potential cancer risk and other adverse health outcomes, primarily cardiac and respiratory.ⁱⁱ Clean Fuel Program actions that reduce GHG emissions will also improve criteria and air toxics pollution, particularly important for communities adjacent to major roadways.

The Agency fully supports a 20% reduction in carbon intensity by 2034 – this level is both feasible and necessary. The Agency conducted multiple scenariosⁱⁱⁱ to better understand availability of lower carbon intensity fuels in the northwest. These scenarios demonstrate that 20% is well within the ability of the northwest region to supply adequate amounts of lower carbon fuels without any significant change to the gross regional product. Our analysis showed as much as a 26% reduction was feasible by 2030, consistent with other analyses that demonstrated similar ranges and timeframes.^{iv}

The Agency appreciates the opportunity to provide this informal comment. Please contact Kathy Strange (kathys@psccleanair.gov or 206-689-4095) or Erik Saganić (eriks@psccleanair.gov or 206-689-4003) with any questions. We look forward to seeing formal rule language and will provide comments in the formal rulemaking process later this year.

Sincerely,



Kathy Strange

Director, Air Quality Programs

ⁱ IPCC, 2022: *Climate Change 2022: Impacts, Adaptation, and Vulnerability*. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press. In Press. <https://www.ipcc.ch/report/sixth-assessment-report-working-group-ii/>.

ⁱⁱ Environmental Protection Agency. Research on Health Effects, Exposure, & Risk from Mobile Source Pollution. <https://www.epa.gov/mobile-source-pollution/research-health-effects-exposure-risk-mobile-source-pollution>.

ⁱⁱⁱ Puget Sound Clean Air Agency, Analysis Finds A Clean Fuel Standard Can Significantly Reduce Pollution, Sept 2019: <https://psccleanair.gov/DocumentCenter/View/3810/Clean-Fuel-Standard-Technical-Analysis-Summary-?bidId=>

^{iv} Malins, C., Lutsey, N., Galarza, S., Shao, Z., Searle, S., Chudziak, C., & van den Berg, M. (2015). Potential low-carbon fuel supply to the Pacific Coast region of North America. The International Council on Clean Transportation. Washington, D.C. https://theicct.org/sites/default/files/publications/PacificCoastRegionLCF_Jan2015.pdf.