April 25, 2022

Rachel Assink
Rulemaking Lead
Washington State Department of Ecology
P.O. Box 47600, Olympia, WA 98504-7600
Via Public Comment Form @ ecology.wa.gov

RE: Clean Fuels Program Rulemaking

Dear Ms. Assink,

The Low Carbon Fuels Coalition ("LCFC") appreciates this opportunity to comment on the proposed Washington State Clean Fuels Program. We have long been a strong supporter, partner and advocate in developing effective performance-based Clean Fuel Standard programs to decarbonize the transportation sector. Since its founding in 2016, the LCFC has been deeply engaged in Washington state in coalition with Climate Solutions, Clean Fuel Washington and other stakeholders in support of a CFP for the state. We applaud the passage of HB 1091, and commend Ecology's work to design and implement the Clean Fuel Program pursuant to its passage.

The LCFC is a non-profit technology-neutral industry trade association that is rapidly expanding and broadening its membership base. For more than seven years, the LCFC has worked to support and expand clean fuel policies and provide input to rulemakings in the United States and internationally. Our diverse membership includes companies that produce clean fuels and clean technologies, and that provide services to the clean fuels industry. Our members include some of the world's leading companies across diverse sectors including biodiesel, direct air capture, electric vehicles, ethanol, methane capture, sustainable aviation fuels, renewable diesel, renewable propane, renewable DME, green hydrogen, and renewable natural gas, as well as consumers of these fuels.

I am submitting these comments on behalf of the LCFC and its membership to urge the Washington Department of Ecology ("Department") to maximize the potential of the Clean Fuels Program to decrease greenhouse gas ("GHG") emissions in the transportation sector, which accounts for the largest portion of GHG in the State.

Specifically, we urge the Department to require a 20% reduction in carbon intensity ("CI") of transportation fuels by 2034--the earliest allowable date in the law. An ambitious GHG reduction trajectory provides long-term certainty to provide the greatest incentive for aggressive early investments in clean fuels and technologies, fostering further innovation, and accelerating the climate benefits of the Clean Fuels Program. Maximizing early GHG emissions reductions is

supported by research showing that deep carbon reductions earlier provide more climate and social benefit than equivalent reductions that occur later in time.[1]

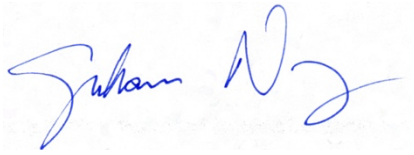
We understand and appreciate Ecology's desire to move rapidly to implement the Clean Fuels Standard Program. However, we are concerned that Ecology may inadvertently slow innovation and the adoption of lower carbon fuels in the state of Washington by delaying the certification of Tier 2 pathways until 2025. We encourage the department to reconsider this and begin using at the start of the CFP program those Tier 2 pathways that have already been certified in California or Oregon.

As a technology neutral trade association dedicated to the implementation of clean fuel standards nation-wide, as well as the establishment of a federal clean fuel standard, we also provide the following recommendations regarding Clean Fuel Program policy design issues:

- The Clean Fuel Program should include carbon intensity reductions that are as aggressive as Ecology determines is feasible with due regarding the existential threat that climate change poses.
- The Clean Fuel Program's carbon intensity schedule should be as long-term as possible.
- Ecology should establish planned rulemakings on a scheduled basis to enable program improvements and adjustments.
- Pathway neutrality should be a guiding principle in the development of the policy. This enables the market to deliver the most cost-effective solutions.

We appreciate the opportunity to provide these comments. Please contact me whenever the LCFC or our membership can be a resource in support of this endeavor.

Best Regards,



Graham Noyes
Executive Director

[1] Frank, J. et al., *Fuel Communications*, "Quantifying the Comparative Value of Carbon Abatement Scenarios Over Different Investment Timing Scenarios," State University of New York College of Environmental Science and Forestry at https://www.sciencedirect.com/science/article/pii/S2666052021000108, May 30, 2021