

13701 NE 171st Street
Woodinville, WA 98072
generalinfo@21acres.org
425-481-1500 | 21acres.org



*We inspire action to solve climate challenges by learning
as a community to grow, eat and live sustainably.*

January 26, 2022

To whom it may concern:

On behalf of 21 Acres Center for Local Food & Sustainable Living, we recognize the work that has gone into developing the Clean Fuels Program. Thank you for showing leadership in the implementation of the program by providing opportunity for comments.

21 Acres Center for Local Food & Sustainable Living is a nonprofit organization committed to educating about the value of agroecology, soil health, local food systems, and green energy and solutions to climate change. Our campus in Woodinville, Washington hosts a Certified Organic regenerative farm, a LEED Platinum certified building, a distribution center for local food, and a year-round retail Farm Market. Due to our unique positioning within the Seattle area and in the food economy, we are able to witness the day-to-day minutiae of what local food means--from growing to aggregation to transportation.

Washington State has demonstrated increasing commitment to climate-oriented priorities and we value the role that the Department of Ecology plays in implementation of these. In reviewing the Clean Fuels Program, we strongly recommend that the rule require a 20% reduction in carbon intensity of fuels be achieved by the earliest date allowed in the law – 2034.

In 2012 and 2016 we were founding nonprofit partners for two highly successful multi-million dollar food hubs aggregating and distributing local food throughout the Puget Sound: Puget Sound Food Hub Cooperative and Farmstand Local Foods. It was ironic to be moving food that was grown without chemical inputs, much of which was Certified Organic, in giant trucks powered by highly polluting fuels. At times we were able to use alternative fuel sources, biodiesel specifically, and we are currently building an all-electric 18-foot refrigerated box truck to move food, but this hasn't been easy. It is our hope that the Clean Fuels Program will not only establish rules that will require compliance but that this shift will foster innovation out of necessity. Such innovation could have helped us with better trucking options for our needs. This could be an important step for future businesses to eliminate fossil fuels along the supply chain.

The entire food value chain will benefit from the Clean Fuels Program, especially on the transportation front. We do see, however, that the proposed rules include significant exemptions including dyed fuel for agricultural uses. Since the fuels used in these exempted industries create a significant percentage of all fuel pollution, it is our hope that we can collectively prepare for a sustainable future along the entire value chain by increasing access and affordability to be able to remove exemptions. We realize what a challenge this is and certainly don't want the need to be perfect to prevent important rulemaking progress to save the planet.

Thank you for the work that you are doing. If you have any questions about 21 Acres, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin B. Crowder".

Robin B. Crowder, Co-Director
rbcrowder@21acres.org