

Audubon Washington

Thank you for the opportunity to submit comments on rules pertaining to the Clean Fuel Standard. Audubon Washington recognizes that climate change and associated air pollution from fossil fuel represents a grave threat to birds and people. As such we are very supportive of a Clean Fuel Standard in Washington State. We believe the rule should be as strong as possible. For that reason, 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 by 2034.

The Legislature granted the Department of Ecology the authority to set this trajectory, which most closely aligns with achieving the statutory reduction in greenhouse gas emissions that Washington is committed to. A 20% reduction in 2034 is also closer to those in other states with Clean Fuel Standards. Both California's and British Columbia's current programs require a 20% reduction by 2030. Oregon is currently in the process of expanding their Clean Fuels Program, and as a result of public feedback, they are considering a standard of 20% below 2015 levels by 2030 and 37% below 2015 levels by 2035.

A 20% reduction in carbon intensity by 2034 is more aligned with Washington State policy, other state's programs, and will lead to faster pollution reductions and the commensurate benefits to our health and well-being. It will lead to a strong signal for greater clean fuels investments in the near term, to the benefit of Washingtonians.

Sincerely,
Adam Maxwell, Audubon Washington