

## Clean Fuels Alliance America (formerly National Biodiesel Board)

Just a quick question and apologies if I missed a discussion covering this at an earlier workshop. For the scope of the CFS regulation, have you considered allowing non-deficit generating fuels used in marine and rail applications to generate opt-in credits? As currently written, the draft rule language exempts marine and rail fuels from being subject to or participating in the CFS in any way, including as credit generators. This is a significant missed opportunity to incentivize cleaner fuels in those two important transportation sectors.

Allowing marine and rail fuels to be credit generators will send a strong signal to those sectors to voluntarily switch to cleaner, lower carbon fuels, thereby facilitating Washington's efforts to achieve its carbon reduction targets. While reducing GHGs upwards of 80% or more, lower carbon diesel replacements like biodiesel and renewable diesel can also significantly reduce particulate matter (PM) emissions 50% or more, which is critical to improving the health of local communities surrounding or downwind of marine and rail facilities in the state. Those GHG and PM benefits are immediate upon switching to lower carbon liquid diesel replacements, which is an important consideration for states working on long-term decarbonization strategies like electrification, especially in the most difficult to decarbonize sectors like heavy duty on/offroad, marine, and rail applications.

I will submit more comments on the proposals involving lifecycle assessments and CI scoring calculations when those topics are covered at the March workshop, but I wanted to get the above question to you for your consideration before then (if you haven't already considered it).

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