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I am commenting on Chapter 173-446 WAC of the Climate Commitment Act Program.

The introduction of the Climate Commitment Act Program is a great step to reduce total Greenhouse gas (GHG) emissions by 2050. Being only the second state in the United States to implement a policy like this puts Washington at the forefront of hopefully the future trends towards clean living. This program is not without some flaws though.

I would like to focus on two points in this proposed revision. The exemption of ethanol and biofuels from GHG reporting, and the absence of urbanization development for GHG reporting.

While there is research to show that ethanol/biofuels can contribute to GHG emission reduction they don't eliminate emissions completely.

- The amount of reduction in CO₂ between ethanol free gas and pure ethanol is not much, 19.64 lbs/gal versus 12.72 lbs/gal. Diesel versus biodiesel has a lesser difference (<http://www.patagoniaalliance.org/wp-content/uploads/2014/08/How-much-carbon-dioxide-is-produced-by-burning-gasoline-and-diesel-fuel-FAQ-U.S.-Energy-Information-Administration-EIA.pdf>).
- Ethanol also has higher evaporation emissions that contribute to ground level ozone and smog (<https://www.eia.gov/energyexplained/biofuels/ethanol-and-the-environment.php>). What reasoning is there to omit ethanol emissions from the covered fuels? <https://theconversation.com/biofuels-turn-out-to-be-a-climate-mistake-heres-why-64463>

In context of urbanization being included in this program for contributing to GHG:

- This study of 66 major cities and 48 suburban areas, finds that the development of areas outside cities/city centers contributes to increased emissions due to higher fuel usage

for transportation, and heavier home heating and cooling.

https://www.nber.org/system/files/working_papers/w14238/w14238.pdf

I believe that this program should continue to be implemented and that it would benefit society as long as all active emission contributors are included and there is now favor or advantage given to some industries and not others.

Thank you for your time and consideration.

I am requesting to become a Party of Record. My contact information follows:

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