

Anonymous Anonymous

My comment is my own, of my own opinion, and does not represent anyone else or my employer. It seems that the proposed rule could do more to reduce emissions by including reductions in private jet flights in and out of Washington state. Private jet aviation has the greatest per trip carbon dioxide emissions of any form of transportation. It seems that the exemption for aviation fuel proposed under WAC 173-424-140(1) is unfair to those that can least afford the burden of increased costs from a clean fuel standard for personal transportation (whether car, motorcycle, or bus). How do billionaires and large corporations want to contribute to fewer carbon emissions from their private jets?

Agricultural and logging fuels should be exempted permanently, as these vehicles represent a relatively small footprint, and are becoming more automated and efficient. Suggest additional clarity how the credit system can be used by residents of Washington State to generate personal credits for not consuming (e.g., not going on a flight or choosing web based interactions rather than getting on a plane for business).

To deal with agency workload issues, suggest reporting annually only, and eliminating the quarterly reporting requirement.

Please clarify how electricity can be regulated as a fuel by Washington State and Ecology, when presumably the exempted list of fuels in the proposed rule are exempted because they are subject to federal regulation. It seems unclear how Washington State could regulate electricity, such as leaving a dam, which appears to cross federal to state boundaries.

Doesn't hydrogen fuel, when consumed in a fuel cell, only produce water vapor at point of emission? If no emissions are produced by the fuel type, please clarify why hydrogen fuels included in the proposed rule.

Suggest "Ecology" is capitalized throughout the proposed rule to clarify it always refers to the Washington State Department of Ecology and not the term ecology generally.

The proposed WAC 173-424-530 states that transacting credits is a regulatory instrument, but then goes on to provide how credits can be traded, including pricing in US dollars. This seems to establish a market. Did Washington State have to submit the proposed rule or market for review by the U.S. Securities and Exchange Commission? How will backstop aggregators (as charities) avoid the "excess benefit transaction", as defined by the Internal Revenue Service, for providing credits?