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Ms. Abby Brown
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P.O. Box 47600
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RE: The Transport Project Comments on the Washington Department of Ecology Proposed Rulemaking Updates to the WA Clean Fuel Standard Program

Dear Director Watson:

The Transport Project (TTP) respectfully submits the following comments on the Washington Department of Ecology (Ecology) Rulemaking Updates to the Washington Clean Fuel Standard (CFS) program and in support of the objective, to continue to incentivize the lowest carbon fuels and technologies available to the transportation market. The CFS rulemaking updates proposed by Ecology are comprehensive and represent significant efforts that are appreciated. It is our belief that Washington should continue to be fuel neutral through the CFS, using national standards and the Argonne GREET model to quantify emission values.

The Transport Project is a national coalition of fleets, vehicle and engine manufacturers and dealers, servicers and suppliers, and fuel producers and providers dedicated to the decarbonization of North America's transportation sector. By continuing to increase the use of gaseous motor fuels including renewable natural gas (RNG) and hydrogen, Washington can achieve ambitious climate goals and greatly improve air quality safely, reliably, and effectively without delay and without compromising existing commercial business operations.

As Washington continues to work toward meeting its emissions reduction goals, it is apparent that it must not only encourage zero emission vehicle (ZEV) adoption, but it must also encourage a variety of low-carbon technologies. Given the continued issues associated with medium- and heavy-duty electric vehicle (EV) performance such as including, cost, range, battery issues, a lack of 1 to 1 vehicle replacement for duty cycles and the lack of stations and grid availability, it is imperative that Washington state and other states also encourage and incentivize low-carbon fuels such as renewable natural gas and other biofuels.

As has been evident in California, the use of low-carbon fuels including renewable diesel and renewable natural gas have produced most of the emissions reductions to date, demonstrating the need to retain these fuels until ZEV technology, charging/fueling and supply reach full operational capacity. There is **no one solution** to the pressing environmental issues facing the transportations sector. Policy makers should move quickly to deploy those technologies and solutions that are readily available, maximize cost-effective emission reductions, and provide a real pathway to carbon neutral or carbon-negative emissions.

The Transport Project commends the latest revisions to the CFS Rulemaking Updates, but offers some suggestions specifically regarding:

- **Book-and-Claim Accounting**

The additional clarity and coordination of definitions with those used by the California Air Resources Board (CARB) and the Oregon Department of Environmental Quality (OR-DEQ) is appropriate and the purpose stated “To ensure the integrity of the emissions reductions from renewable electricity and RNG production, incentivize additional renewable resources to be delivered to Washington, to better align program incentives with the promotion of new and additional renewable electricity and RNG production, and to better align with meeting statewide meet its emissions reduction goals.

However, TTP is concerned though that Ecology has gone too far beyond California’s LCFS Book-and-Claim language regarding timelines and requirements to show at least 50% of physical flow in the pipelines on an annual basis by 2032. Washington’s CFS must allow for consistent claims in RNG volumes across the Renewable Fuel Standard and the CFS.

- **Avoided Methane Crediting**

According to the text, this update is being made “To better incentivize new and additional methane would not have occurred in the absence of the CFS program receives the most generous incentives from avoided methane crediting.” This is a necessary update and is appreciated. One concern is the 14-year limit on eligible projects, given the previously mentioned concerns with picking a future single technology, may not be long enough for that technology to be ready. The Transport Project recommends avoiding hard timeframes for phasing out proven emissions reduction options.

- **Establishing a “True Up” Process**

Synchronizing processes among various state CFS processes and methods is important and one that Washington should consider is a “true up” process such as that proposed in California, which helps to address the under crediting currently experienced by RNG projects as they wait for pathway approval. Also, the first true up should be from the Temporary to the Provisional CI upon awarding of credits for the first quarter in which the Provisional CI score is approved for use.

- **RNG as an Input for Renewable Hydrogen**

TTP commends Ecology for considering the value of RNG as an input for renewable hydrogen, and it will push hydrogen emissions lower as fueling infrastructure and use expand.

The Transport Project thanks Ecology for their work and requests consideration for our comments and requests made regarding the proposed CFS rulemaking. We strongly believe that multiple fuels and technologies will be needed to reduce emissions, and that the “best fit for the purpose” should be the guiding principle. The key is to find proven products that are available, that effectively and affordably lower emissions, have existing infrastructure for fueling/charging and fit the current business model.

Please contact me with any questions.

Sincerely,



Sherrie Merrow
The Transport Project Director of State Government Affairs

Advocating the increasing use of NGVs where they benefit most.
For the economy. For the environment. For health. For security. **For America.**