



August 1, 2025

Adam Saul
Department of Ecology
Climate Pollution Reduction Program
300 Desmond Drive SE
Lacey, WA 98503

Dear Mr. Saul,

I write to share brief comments regarding Ecology's proposed updates to **Chapter 173-424 WAC, Clean Fuels Program Rule**.

First, I commend Ecology for taking concrete steps to address harmful emissions, am pleased to see the proposed new incentives for sustainable aviation and marine fuels. Not only are the aviation and marine sectors critically important to Washington's economy, but they are also notoriously difficult to decarbonize. These are exactly the kinds of innovations needed to keep our industries strong and on the leading-edge.

For similar reasons, I would like to express concerns about the proposed rulemaking changes that would affect Washington's dairy industry, such as those described on *page 92, section (16) Avoided methane crediting (c) (i)*, that would limit methane credit generation to a maximum of 15 years, while our neighbors in California extend payments to 20 years. While this may seem like a minor variance, it is out of sync with the longevity of the technology, would likely negatively impact older operating digesters, and disincentivize new adoption and innovation in the sector.

The Clean Fuels Program Rule presents a significant opportunity to build trust with the agricultural community and seize opportunities to invest in common sense, farmer-centered solutions.

Every impediment to on-farm innovation or barrier to incentives means that our farm systems are more likely to fall behind and become further exposed to economic and other risks. There are numerous experts in the state who would be keen to work with Ecology to identify changes that benefit both carbon removal and agriculture. Each acre that stays in agriculture means a more food-secure, climate and flood-resilient state.

Agriculture is and must remain a central part of Washington's identity, economic vitality, and resilience.

Sincerely,

Kathleen Guillozet, PhD
Watersheds Program, Senior Director