



March 2, 2026

Clean Fuels Program
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Forthcoming Rulemaking for Chapter 173-424 WAC – Clean Fuels Program

Dear Clean Fuels Program Staff,

SkyNRG Americas (SkyNRG) appreciates the opportunity to comment on topics to address in the forthcoming rulemaking for Chapter 173-424 WAC – Clean Fuel Standard (CFS).

SkyNRG is developing a Sustainable Aviation Fuel (SAF) production facility, Project Wigeon, in Walla Walla County in Eastern Washington. Project Wigeon will produce SAF and renewable diesel (RD) on a commercial scale from biomethane, often referred to as renewable natural gas. SkyNRG's SAF would reduce lifecycle greenhouse gas emissions of aircraft that use SAF by approximately 85%¹ and harmful emissions like sulfur and particulate matter by 90% or more,² relative to traditional jet fuel. SkyNRG anticipates participating in the CFS as an opt-in fuel under RCW 70A.535.150.

Under HB 1409, the Legislature updated the CFS carbon intensity standards to require a 45% reduction in emissions from transportation fuels by 2038. It also provided Ecology with the discretion to adjust the standard to 55% by 2038, if by 2030, transportation emissions do achieve proportional reductions in greenhouse gases, or the zero-emission vehicle program is not fully enforced.³

SkyNRG suggests that Ecology clarify by rule that if these conditions are met in 2030, Ecology *will* adjust the schedule to a 55% reduction. It takes several years bring new clean fuel facilities and technologies to Washington. Providing greater certainty of the future demand for clean fuels will spur necessary investment in clean fuels development, and related job growth. If it is unclear whether Ecology will exercise its authority to adjust the standard to 55% even if the conditions authorizing the change are met, investment in clean fuels may lag even if Ecology ultimately adjusts the standard. Providing clarity in this rule that Ecology will indeed increase the carbon intensity standards will provide the confidence needed to spur investment in new clean fuel resources.

¹ Emission savings based on WA-GREET when compared against fossil baseline of 87.42 gCO_{2e}/MJ

² <https://www.mdpi.com/2076-3417/14/13/548clean-fuel4>

³ RCW 70A.535.025(5).

Ecology also indicated it plans to adopt GREET 4.0. SkyNRG understands that the updates to GREET are generally improvements required to align with other state clean fuels programs such as California LCFS and Oregon CFP, but as with any model, there is a risk that assumptions embedded in the model do not reflect conditions at a given facility, fuel source, or region. SkyNRG suggests Ecology retain the discretion to approve fuel pathways reflecting the best available information for a facility or fuel source. We believe project specific conditions will help meet Ecology's goal of improving the integrity of the program. SkyNRG also expects to submit comments and suggestions to consider when developing WA-GREET 4.0.

SkyNRG also recommends that CFS rule updates reflect that methane capture remains one of the most effective short-term methods to reduce greenhouse gases. The CFS is the primary tool by which methane capture is incentivized in Washington, and after an extensive and inclusive process, Ecology developed a balanced rule in 2025 that incentivizes methane capture within reasonable parameters. SkyNRG recommends the CFS program continue supporting methane capture without adding new restrictions that could hamper development of clean fuel.

Thank you again for the opportunity to provide comments on the proposed rulemaking. We sincerely look forward to an ongoing collaboration and partnership with Ecology to implement the CFS program.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Plaza', with a stylized, flowing script.

John Plaza
President & CEO
SkyNRG Americas, Inc.