



Clean Fuels
ALLIANCE AMERICA

March 2, 2026

Lauren Sanner
Washington Clean Fuels Standard Climate Rulemaking Planner
300 Desmond Drive SE
Lacey, WA 98503

Re: Comments on the upcoming 2026 CFS rulemaking

Submitted electronically: [Chapter 173-424 WAC and WAC 173-455-150, Clean Fuels Standard Rulemaking Informal Comment Period](#)

To Whom it may Concern,

The Clean Fuels Alliance America (Clean Fuels) appreciates the opportunity to provide written comments on the upcoming 2026 CFS rulemaking. Clean Fuels is the U.S. trade association representing the entire supply chain for biodiesel, renewable diesel, sustainable aviation fuel, and Bioheat® fuel for thermal space heating. Our membership includes over 100 farmers, producers, marketers, distributors, and technology providers, and many are members of environmental organizations supportive of state and local initiatives to achieve a sustainable energy future.

Clean Fuels appreciates your request for initial feedback from stakeholders prior to launching the formal rulemaking process. Clean Fuels strongly supports the Clean Fuels Standards (CFS) leading role in decarbonizing Washington's transportation fuels and applaud its success over the first 3 years of the program. In that time, almost half a billion gallons of biodiesel and renewable diesel have been delivered to Washington, resulting in almost 2 million metric tons of GHGs reduced which is equivalent to taking 466,511 cars off the road for a year. Our fuels are responsible for over 47% of all credits generated in the CFP.

With respect to the upcoming rulemaking, Clean Fuels has the following comments:

Establishing Longer-term Targets

Clean Fuels appreciates the bold ambition of the 2025 Washington Legislature by passing HB 1409 that will reduce the lifecycle greenhouse gas emissions from transportation fuels by 45% below 2017 levels by 2038, with the option to reduce as much as 55% by 2038 if certain conditions are met. This will allow Washington to align its climate ambitions with those of California who advanced their respective low carbon fuel standard program in 2025.

Underlying fuel supply and demand analysis

In order to determine feasible mid-term carbon intensity reduction targets, Clean Fuels recommends that the Department of Ecology undertake a detailed and transparent analysis that allows for stakeholders to participate in determining the appropriate

Missouri Headquarters
605 Clark Ave
PO Box 104898
Jefferson City, MO 65110

800.841.5849

Washington, D.C., Office
1331 Pennsylvania Ave, NW
Suite 505
Washington, D.C. 20004

888.246.3437

cleanfuels.org

assumptions through 2038. Allowing stakeholders to provide input on what they anticipate the market condition will be for their fuels will produce a more robust analysis. It will also be important that Washington's future fleet and fuel demand both individually and regionally be considered. This comes at a pivotal point in history where the demand for zero emission vehicles has been significantly impacted by the removal of: 1) federal waivers of California's regulations, and 2) incentives for both electric vehicle and charging infrastructure investments by the federal government. These two huge policy shifts are sure to alter any previous analyses regarding the demand for low carbon liquid fuels in both the short- and long-term, making this new analysis critical.

Modifying Near-term Targets

With this updated analysis, Clean Fuels anticipates that the targets for 2028 through 2037 may also change from what they are currently. It will be important for stakeholders to understand how the changes in the annual targets were impacted by the new analysis on a year-by-year basis and not only in the "out" year of 2038.

Additional Provisions

While not explicitly included in the current proposed scope of this rulemaking, Clean Fuels requests clarification as to whether any of the new provisions in California's Low Carbon Fuel Standards program are being considered for inclusion in the CFS.

Thank you again for the opportunity to submit written comments at this time. Please feel free to contact me at cwind@cleanfuels.org if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Cory-Ann Wind".

Director of State Regulatory Affairs
Clean Fuels Alliance America