

Reemah Karvir

To Whom It May Concern,

My name is Reemah Karvir, and I am a student in Washington State. I appreciate the opportunity to comment on rulemaking for Chapter 173-424 WAC – Clean Fuel Standard (CFS).

Decarbonizing transportation is extremely important, as it remains Washington's largest source of greenhouse gas emissions, accounting for 38.2 million metric tons. I strongly support the strengthening of the CFS to increase carbon intensity reduction requirements from 20% to 45% below 2017 levels by 2038.

Additionally, I support the planned update of the WA-GREET model in order to ensure that the carbon intensity calculations rely on the most current scientific methodology. However, I would like to also emphasize the importance of making the updated model accessible to the public. Providing clear explanations of how lifecycle greenhouse gas emissions are calculated would allow members of the community to better evaluate their effectiveness. Regarding the GREET model, how will it be reviewed or audited over time to ensure that its assumptions remain scientifically valid and aligned with emissions outcomes?

Another area that would benefit from clarification is the feasibility of meeting the increased reduction targets within the proposed timeline. The goal to reduce transportation fuel emissions by 45% by 2038 is definitely strong; I am curious to know in greater detail how progress will be monitored and adjusted. What benchmarks or targets will be used to ensure that the program remains on track?

I also support the consideration of technical amendments to improve implementation, fee structure, and the integrity of credited emissions reductions. There should be very clear safeguards in place to prevent inflated/inaccurate crediting. Reductions claimed under the program should reflect measurable (as well as verifiable) environmental benefits.

One area I urge the Department of Ecology to consider further is affordability. As the Clean Fuel Standard expands, it is important to ensure that the transition to low-carbon fuels doesn't disproportionately impact low-income communities that may have limited access to alternative fuels or electric vehicles. One last concern I have regarding this is that while this would promote sustainability in the long-term, the short-term price increases this comes with could disproportionately affect working families dependent on transportation for employments and to sustain themselves.

Overall, I support the rulemaking effort and believe that strengthening the CFS is a key step toward achieving Washington's climate goals.

Sincerely,
Reemah Karvir