



March 3, 2026

Lauren Sanner
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Climate Pollution Reduction Program
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Re: Informal Comments on Chapter 173-424 WAC and WAC 173-455-150

Ms. Sanner,

On behalf of the RNG COALITION, thank you for initiating this rulemaking to implement House Bill 1409 and strengthen Washington's Clean Fuels Standard. We strongly supported HB 1409 and appreciate the Department's continued leadership in advancing a more ambitious and effective program.

Transportation remains Washington's largest source of greenhouse gas emissions. Updating the carbon intensity reduction schedule to HB 1409's statutory direction is a critical step in ensuring the program delivers meaningful long-term emissions reductions.

Renewable natural gas (RNG) can and should play a constructive role in helping Washington achieve these strengthened targets.

RNG is produced from capturing methane in organic waste streams including landfills, wastewater treatment facilities, food waste operations, and agricultural waste. By capturing methane that would otherwise be emitted to the atmosphere and converting it into a low to negative carbon fuel, RNG delivers dual climate benefits: methane mitigation and fossil gas displacement. Given methane's potency as a short-lived climate pollutant, these reductions are particularly valuable in the near term as Washington works to meet its statutory climate commitments.

Washington is well positioned to benefit from RNG development. The state has significant potential feedstock resources and a growing clean transportation sector with medium and heavy-duty vehicle fleets where low-carbon liquid and gaseous fuels remain essential. RNG is one of the few commercially available solutions today that can meaningfully reduce lifecycle emissions in these hard to decarbonize sectors.

A strengthened Clean Fuels Standard creates durable market signals that help unlock private capital for projects that reduce emissions in Washington communities. RNG facilities create construction and long-term operations jobs, support local farmers and waste management operators with new revenue streams, divert food waste from landfills, and improve local air quality by reducing methane emissions.



The RNG COALITION and our member companies stand ready to serve as a resource throughout this rulemaking. We are happy to provide technical input, market information, and industry perspective to help ensure the Clean Fuels Standard remains ambitious, durable, and grounded in operational realities.

Thank you for your leadership and for the opportunity to provide comments at this early stage of the rulemaking process. We look forward to continued engagement as the rule is updated.

Sincerely,

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