



1400 K Street NW, Suite 905
Washington, D.C. 20005
Ph: (605) 965-2200
poet.com

March 30, 2026

Gopika Patwa
Climate Policy Planner & Rule Lead
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Submitted electronically via: <https://ecology.commentinput.com/?id=VTsScRh37>

RE: POET Comments on Draft Language for WAC Clean Vehicles Program Rulemaking

Dear Ecology:

POET appreciates the opportunity to comment on Ecology's draft rulemaking language for Chapter 173-423 WAC Clean Vehicles Program ("CVP"). As the world's largest producer of bioethanol and a key stakeholder in Washington's transportation fuel supply, POET actively participates in Ecology's rulemakings related to fuel emissions programs. POET reiterates its comments submitted for this ongoing rulemaking on February 2, 2026, and offers the following comments in support of the CVP's goals in achieving emissions reductions and improving air quality in Washington.

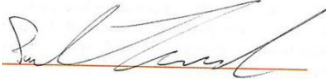
Low-CI bioethanol remains the one of most reliable fuels for reducing carbon emissions in Washington's transportation fuel mix, particularly in view of the current federal regulatory environment. The significant changes to federal policy over the past year have created uncertainty for state-level transportation decarbonization programs, especially for any rule intending to rely on California's vehicle emissions standards. Indeed, as reflected in the updated CVP rulemaking language, legal challenges to California's EPA waivers illustrate how quickly the federal regulatory landscape can shift in ways that affect Washington's ability to rely on any single compliance pathway. California's indefinite pause of its Advanced Clean Trucks and Omnibus rulemakings in view of ongoing federal action further underscores this dynamic.

In this environment, Washington's long-term sustainability goals are best served by a diversified, flexible approach to transportation decarbonization—one that does not depend entirely on a single technology pathway. Low-CI bioethanol is a readily available, domestically produced, and continuously improving low-carbon fuel that can deliver meaningful emissions reductions today, regardless of how federal policy evolves. Moreover, a flexible, diversified approach to decarbonization is not only prudent given federal uncertainty, but it is also more equitable. By delivering emissions reductions across the existing liquid-fuel vehicle fleet, low-CI bioethanol provides near-term air quality and climate benefits to communities that may not yet have broad access to zero-emission vehicles, including rural and lower-income communities. POET urges

Ecology to recognize this complementary role of bioethanol in view as it administers the CVP program.

POET appreciates the opportunity to comment on the Clean Vehicles Program and looks forward to continued cooperation with Ecology. If you have any questions, please contact me at Paul.Townsend@POET.com or (605) 756-5612.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul W. Townsend", is written over a thin red horizontal line.

Paul W. Townsend
Regulatory Counsel