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Adam Saul
Department of Ecology
Climate Pollution Reduction Program
PO Box 47600
Olympia, WA 98504-7600

Submitted electronically via: <https://ecology.commentinput.com/?id=r6j3iP8k4>

**RE: POET COMMENTS ON WASHINGTON'S DEPARTMENT OF ECOLOGY'S
CLEAN FUEL STANDARD RULEMAKING**

Dear Mr. Saul:

POET appreciates the opportunity to participate in Washington's Department of Ecology's ("Ecology") Clean Fuel Standard ("CFS") Rulemaking and to provide comments on the May 27 CFS Rulemaking Workshop ("May 27 Workshop"). POET has participated actively in past rulemakings through the submission of comments and engagements with Ecology's staff, and POET looks forward to continuing its positive relationship with Ecology throughout the new CFS rulemaking process.

During the May 27 Workshop, Ecology focused on electrification topics, specifically the energy economy ratio (EER) of light-duty EVs and public transit.¹ Ecology explained that although the "CFS supports the use of clean transportation fuel technologies," it focused on electrification because, in part, of the "[o]ppportunity to scale zero emission vehicle (ZEV) efforts."² The May 27 Workshop follows the trend of Ecology being primarily focused on electrification while giving little attention to other clean transportation fuel technologies, such as low-CI bioethanol, despite the GHG-reduction capabilities of these fuels. Not only does this trend deviate from the program's technology neutrality, but it also puts Washington at risk of being unable to realize its ambitious carbon-reduction and SAF-hub goals.

¹ See *generally* Energy Economy Ratios (EER) and Transportation Electrification Workshop, Clean Fuel Standard Rulemaking, Climate Pollution Reduction Program (May 27, 2026).

² *Id.* at slide 11.

POET urges Ecology to consider in more detail the advancements in low-CI biofuels and how those carbon-reduction opportunities can be accounted for in the CFS. For example, the current CFS rulemaking would benefit from discussions of climate-smart agricultural (“CSA”) practices and the scientific advances into the understanding of indirect land-use change (“ILUC”). These two topics are supported by a wealth of recent research, all of which demonstrate how amendments to the low-CI liquid fuel portions of the CFS can continue reducing emissions of liquid fuel used in legacy internal combustion engine vehicles. If Washington is to succeed in the ambitious SAF goals and new CI-reduction goals required for the CFS, it will need low-CI ethanol to play a major role. And for low-CI ethanol to help achieve Washington’s goals, Ecology should recognize, rather than ignore, the innovations taking place in the bioethanol industry.

POET appreciates the opportunity to comment and looks forward to working with Ecology to make the Clean Fuel Standard a continued success for Washington. 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 horizontal line.

Paul W. Townsend
Regulatory Counsel