

September 30, 2026

Ms. Abbey Brown
Clean Fuel Standard Technical Lead
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504

RE: Chapter 173-424 WAC and WAC 173-455-150, Clean Fuel Standard Rulemaking and Informal Comments on CI Reduction Schedule

Dear Ms. Brown:

On behalf of the American Soybean Association (ASA), we appreciate the opportunity to comment on the carbon intensity (CI) reduction schedule scenarios proposed by the Washington State Department of Ecology (Ecology), which will inform ongoing rulemaking to amend the Clean Fuel Standard (CFS). ASA represents approximately 500,000 U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 soybean-producing states. U.S. soybean growers have long been committed to producing the world's food, feed, fuel, and thousands of bioproducts in a sustainable and climate-smart way.

ASA strongly supports the objective of the CFS to reduce the CI of transportation fuels; however, the success of the program depends on policies grounded in current science, consistent verification standards, and a technology-neutral framework that preserves fuel affordability, reliability, and supply diversity. Decisions that inadvertently disadvantage domestically produced agricultural biofuel feedstocks risk undermining both the environmental credibility and economic stability of the program.

Moreover, ASA understands the value of an ambitious, durable CFS that maintains an available fuel supply and transparent lifecycle accounting. The Ecology discussion paper includes three scenarios which meet the statutory requirement of a cumulative CI reduction of 45% (compared to 2017 levels) by 2038. The differences among the CI reduction schedule scenarios are modest. However, when determining the pace of implementation, Ecology should review potential impacts to credit supply, fuel procurement, investment decisions, and compliance costs. Considering CFS credit bank growth and modest difference in CI reduction targets from 2028-2031, ASA does not currently have a preference among the three scenarios.

ASA recommends that Ecology work swiftly to publish its independent modeling and analysis, which is required for updated rulemaking, to afford stakeholders the appropriate time to review the results and provide feedback. The analysis should allow Ecology and the public to compare the near-term benefits of annual CI reduction targets against the practical conditions required to achieve them.

ASA recommends the analysis assesses impacts on credit markets and industries across low-carbon fuel value chains. **Specifically, ASA requests that Ecology:**

1. Show how each scenario would be met, year by year. Publish projected fuel volumes, carbon intensity values, credits, deficits, and banked credits by fuel type. Identify the expected contribution of biodiesel and renewable diesel, including pathways using U.S. soybean oil, without assuming any single feedstock will supply all future growth.
2. Test if the fuel supply can respond to early CI reduction targets. Evaluate production capacity, feedstock availability, transportation and distribution constraints, and demand from other markets. Include scenarios in which deployment of low-carbon transportation options or expansion of liquid fuel supply is slower than projected.
3. Compare market and consumer outcomes. Assess credit supply and demand, credit prices, compliance costs, and potential effects on gasoline and diesel prices for each scenario. Explain the assumptions and uncertainty ranges so stakeholders understand which results are contingent on favorable market conditions.
4. Measure the value of earlier reductions. Quantify the difference in cumulative CI reductions among the scenarios through the years before 2038. This would clarify what additional near-term emissions benefit, if any, is associated with a faster schedule and what supply response it requires.
5. Keep the conditional 55% pathway analytically distinct. If Ecology models a potential 55% reduction by 2038, present it separately from the schedules designed to meet the required 45% reduction target. Explain the assumptions and market implications of that pathway without treating the conditional increase as an adopted requirement.

Ecology should draw on its existing fuel supply forecasts and credit-market data and make the modeling assumptions available for review. Consistent treatment of qualifying fuel pathways, including biomass-based diesel derived from U.S. soybean oil, will help ensure that the CFS schedule rewards verified emissions reductions and gives farmers, feedstock processors, and the entire value chain a sustainable and dependable investment signal.

ASA looks forward to reviewing the independent analysis and providing Ecology with additional feedback before the proposed rule is published, including a clear recommendation regarding the CI reduction schedule for 2028-2038. On behalf of U.S. soybean farmers, thank you for the opportunity to comment. ASA welcomes future engagement with Ecology to discuss the role of U.S. soy-based biofuels in Washington's clean energy future.

Sincerely,

A handwritten signature in black ink, reading "Scott Metzger". The signature is fluid and cursive, with the first name "Scott" and last name "Metzger" clearly legible.

Scott Metzger, President
American Soybean Association