



1807 3rd Street NW
Great Falls, MT 59404

September 30, 2026

Submitted online at: <https://ecology.commentinput.com>

Ms. Lauren Sanner
Washington State Department of Ecology
Clean Fuels Program Rulemaking
P.O. Box 47600
Olympia, WA 98504-7600

Re: Comments on CI Reduction Schedule for Washington's Clean Fuels Program
(Chapter 173-424 WAC)

Dear Ms. Sanner:

Thank you for the opportunity to comment on the carbon intensity reduction schedule for Washington's Clean Fuels Program. Montana Renewables, LLC (MRL) is a renewable fuel producer based in Great Falls, Montana. We provide consumers in Washington with a reliable source of low-carbon fuels and products, including renewable diesel (RD), sustainable aviation fuel (SAF), and renewable naphtha (RN).

We applaud the leadership Washington has shown in setting ambitious emission reduction goals for its Clean Fuels Program, including a carbon intensity (CI) reduction target of 45% below 2017 levels by 2038 with the option to reach 55% under specified conditions. These targets send clear and durable demand signals, providing the long-term regulatory certainty needed to support continued investment in low-carbon fuel production, infrastructure, and innovation.

With this in mind, we encourage Ecology to choose "Scenario A" in its Discussion Paper on Carbon Intensity Targets (2028-2038) and establish a 4% greenhouse gas emissions reduction requirement in 2028. MRL believes this target is both achievable and necessary to maintain market certainty, support ongoing investment in low-carbon fuel production and infrastructure, and preserve a healthy credit market that incentivizes continued emissions reductions.

Thank you for your continued work implementing Washington's Clean Fuels Program and advancing the state's transportation decarbonization objectives. If you have any questions or would like any additional information, please do not hesitate to contact me or other members of our team.

Sincerely,

A handwritten signature in black ink, appearing to read 'BF', with a stylized flourish at the end.

Bruce Fleming
Chief Executive Officer
Montana Renewables, LLC