

Colleen Lamothe (Colleen Lamothe)

September 30th, 2026

Lauren Sanner
Washington Clean Fuels Standard Climate Rulemaking Planner
300 Desmond Drive SE
Lacey, WA 98503

Re: Comments on the CI Reduction Schedule
Submitted electronically: <https://ecology.commentinput.com/?id=pDR9UNjH4>

Dear Washington State Department of Ecology (Ecology),

Advanced Biofuels Canada Association (ABFC) appreciates the opportunity to comment on the draft carbon intensity reduction scenarios for 2028-2038. ABFC is Canada's national trade association for advanced biofuels and renewable synthetic fuels. ABFC members produce a portfolio of liquid low-carbon fuels, sustainable feedstocks, and intermediary products. Our members operate over 11 billion gallons of low carbon fuel production capacity globally and are significant suppliers to renewable and low carbon fuels in Canada, the U.S., and worldwide. Many of our members have operations in both the United States and Canada.

ABFC appreciates the opportunity to provide comments on the scenarios presented in the CI Reduction Schedule white paper. Our comments address Ecology's three questions.

1) Which scenario do you prefer: A, B, or C? Why?

Scenario A sets a 4.0% annual CI reduction in 2028 then 3% each year through 2038 to reach the 45% cumulative reduction by 2038.

A 4% step in 2028 produces a noticeable increase in obligation for gasoline and diesel suppliers in the next cycle. That increase supports firmer 2028–29 credit prices and a clearer incentive to bring clean fuel into Washington. Production capacity is available to meet demand for biodiesel, renewable diesel, and sustainable aviation fuel. The program's early over-performance has built a credit bank that can help the market absorb this path.

Scenarios B and C use a smaller 2028 increment (3.5% and 3.25%). This would delay the market signal at the same time obligated parties are planning for coming years.

2) Do you prefer a more gradual schedule or a less gradual schedule? Why?

ABFC prefers a less gradual schedule. A steeper initial increase drives near-term demand for clean

fuel and the delivery of low carbon fuels to Washington, bringing greater emissions reductions and a stronger production signal. Fuel production and supply require long-term planning, and an earlier increment of demand supports investment and sustains production in the years that follow.

All three scenarios reach the same 45% endpoint, the difference is when the reduction occurs. Front-loading is the best option from a climate perspective, where biofuels can act immediately for near-term decarbonization of transportation.

3) Are there alternative scenarios you would like Ecology to consider?

We do not propose a fourth percentage path. The presented scenarios are sufficient for establishing annual CI reduction targets.

Thank you for this opportunity to provide comments, we welcome the opportunity to meet with you to discuss these recommendations further.

Yours truly,

Colleen Lamothe
Vice President, Advanced Biofuels Canada
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Advanced Biofuels Canada Association (ABFC) is the national industry voice for producers, distributors, and technology providers for non-fossil, low carbon, and sustainable fuel replacements to gasoline, diesel and jet fuels. ABFC members produce a portfolio of liquid clean fuels (including ethanol, biodiesel, renewable diesel and low carbon jet fuel), sustainable feedstocks, intermediary products, and produce/consume low carbon gaseous products, such as renewable natural gas (RNG) and low carbon hydrogen. Members are also engaged with carbon capture, utilization, and storage technologies. Our members operate over 45 billion litres of low carbon fuel production capacity globally and are significant suppliers to renewable and low carbon fuel regulations in British Columbia, Canada, and worldwide.

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