



September 25, 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>

To Whom it may Concern,

The Clean Fuels Alliance America (Clean Fuels) appreciates the opportunity to provide written comments on the CI Reduction Schedule considered for the upcoming rulemaking package. Clean Fuels is the U.S. trade association representing the entire supply chain for biodiesel, renewable diesel, and sustainable aviation fuel. Our membership includes over 100 farmers, producers, marketers, distributors, and technology providers, and many are members of environmental organizations supportive of state and local initiatives to achieve a sustainable energy future.

Clean Fuels appreciates the opportunity to provide comments on the scenarios presented in the CI Reduction Schedule white paper. As prompted by Ecology, Clean Fuels has the following comments:

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

Clean Fuels prefers Scenario A. We believe the early success of the program has created a large enough of a credit bank that will be able to be sustained with the most aggressive scenario. The increased demand for credits will drive clean fuel providers to delivery larger volumes and lower carbon options to Washington and the ensuing higher credit prices will incentivize those actions. Biodiesel, renewable diesel, and sustainable aviation fuel stand ready to meet that demand.

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

There is not that much difference between the three scenarios in terms of total reductions in the 2028 - 2031 time period but from a climate perspective, we believe that maximizing reductions as soon as possible is the most effective approach.

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

No. The scenarios that are presented in the white paper provide sufficient information to consider towards establishing the annual CI targets.

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Thank you again for the opportunity to submit written comments at this time. Please feel free to contact me at cwind@cleanfuels.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Cory-Ann Wind". The script is cursive and fluid, with the first name "Cory" and last name "Wind" being more prominent than the middle name "Ann".

Director of State Regulatory Affairs
Clean Fuels Alliance America