



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 18, 2025

**Washington Department of Ecology comment for the New Mexico Environment
Department Environmental Improvement Board's consideration of their Clean
Transportation Fuel Standard rule**

Environmental Improvement Board,

Washington State is one of four states, including New Mexico, that has adopted a clean fuels policy, a key part of our state's strategy to reduce total greenhouse gas emissions 95% by 2050. The Department of Ecology's Climate Pollution Reduction Program implements the Washington Clean Fuel Standard (CFS). CFS staff have provided technical support to the New Mexico Environment Department's (NMED) Climate Change Bureau as they developed the regulatory language currently under your consideration.

To create a stable, consistent regulatory environment, coordination between states is crucial. It's efficient because regulators don't have to reinvent the wheel. Additionally, when states adopt best practices from one another, it creates regulatory certainty for businesses who operate in multiple jurisdictions. When Washington was developing our policy, we learned from staff at the California Air Resources Board and the Oregon Department of Environmental Quality. Learning from our peers also helps us decide how to tailor these types of policies to the unique needs of our states.

Ecology and NMED worked together extensively over the last year. Ecology's CFS team and NMED met twice a month during NMED's rule development process. This included providing technical background on the policy's implementation, decisions Ecology made during our initial rulemaking, and what we have learned since the policy began implementation. NMED staff came to meetings with lists of questions that led to robust discussions about how to make decisions in the context of this regulation, and which decisions were right for New Mexico. They also sought separate meetings on adapting the IT platform's code base from California with a member of the CFS team. This extensive effort demonstrated a strong desire by New Mexico to build the knowledge necessary to successfully implement this program and to answer questions from New Mexico's interested parties.

While the clean fuels policies in different states are operationally separate from each other, much of the regulatory language is identical, so there is a significant amount of coordination that occurs between state governments. This allows for states to align wherever possible and improves regulatory certainty for businesses. Cross-state collaboration allows us to be better



regulators, as demonstrated by the New Mexico Environment Department's Climate Change Bureau during this rulemaking.

Respectfully,

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