



February 10, 2020

Craig T. Kenworthy, Executive Director
and Board of Directors
Puget Sound Clean Air Agency
1904 Third Avenue, Suite 105
Seattle, WA 98101

Emailed to: CleanFuels@psccleanair.gov

Re: Comments on Proposed Clean Fuel Standard

Dear Mr. Kenworthy and Board of Directors:

The League of Women Voters of Tacoma-Pierce County supports adoption of the Proposed Regulation IV of the Puget Sound Clean Air Agency, Clean Fuel Standard (CFS).

A group of our members recently met with a brilliant young scientist from Guatemala who is working on technology that will help central and south Americans reduce their CO₂ emissions. He sternly said, "This is a crisis. If we don't radically change our behavior to solve this problem, we will all die". With his science background, this warning was compelling. And while we frequently talk about behavior change, it actually takes regulation to make us do it.

We understand this proposed standard to be one that would be stricter than what is currently proposed at the state Legislature. Since the transportation sector in the Puget Sound region accounts for nearly 40 percent of greenhouse gas (GHG) emissions in this four-county area, and a large share of the emissions statewide, this standard is needed regardless of whether or not the state Legislature adopts its proposed standard.

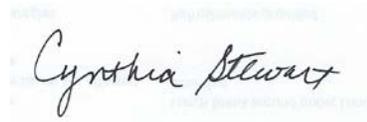
We understand from the ICF analysis that the Puget Sound region's transportation fuels market has a significant carrying capacity for low carbon fuels, and the deployment of a low carbon fuel strategy such as is proposed would be feasible. We further understand that while it would require a range of investments in low carbon fuel production, retail distribution infrastructure, and advanced vehicle technologies, the CFS would have a negligible effect on the forecasted economic/employment growth in the region. Most importantly, the analysis indicates that positive health impacts would be associated with implementation of the proposed standard.

Since Washington is currently the only state on the West Coast that has not implemented such a standard, this rule would bring us closer into alignment with the standards Oregon, California, and British Columbia have had in place now for more than five years. The fact that PSCAA's proposed rule essentially mimics the California standard means that fuel producers are already familiar with the requirements. This should make compliance easier.

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For health of our climate and our people, we encourage adoption of this regional standard regardless of what the state Legislature enacts.

Sincerely,

A handwritten signature in black ink that reads "Cynthia Stewart". The signature is written in a cursive style and is centered within a light blue rectangular box.

Cynthia Stewart, President