



**Washington State
Department of Transportation**

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April 25, 2022

Debebe Dererie
Department of Ecology
Air Quality Program
P.O. Box 47600 Olympia, WA 98504-7600

RE: Preproposal Statement of Inquiry (CR-101) – Clean Fuels Program Rule in 172-424 WAC

Dear Mr. Dererie:

The Washington State Department of Transportation (WSDOT) is submitting comments regarding the Department of Ecology's filing of a CR-101 to establish new rules under the Clean Fuels Program. In light of the newly passed SSB 5974 Section 412, which revises RCW 70A.535.050, it may be necessary to enable credit revenues from the transportation investments specified in the new law. Specifically, WSDOT recommends that credit generation from the supply of electricity as fuel to the state ferry fleet be eligible in the rule and that ferry system electrification is addressed similarly to how the draft rules (dated April 13, 2022) address "Fixed Guideway Systems" transit entities.

WSDOT looks forward to working with Department of Ecology staff to implement the provisions of the Clean Fuels Program in the WAC. Please contact Jonathan Olds at oldsj@wsdot.wa.gov with any questions or to discuss how we can assist through the process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ahmer Nizam".

Ahmer Nizam
Environmental Services Director

cc: Jonathan Olds, Sr. Policy Analyst for Climate Change