



April 25th, 2022

Ms. Rachel Assink
Rulemaking Lead
Washington State Department of Ecology
300 Desmond Drive SE Lacey, WA 98503

Dear Ms. Assink,

The Western Washington Clean Cities Coalition (WWCC) has been pleased to support the goals of improving transportation energy efficiency and advancing affordable, domestic transportation fuels and technologies in public and private fleets since 1998.

The WWCC recognizes the hard spent time, energy, and patience invested on your end in the current 2022 Washington State Clean Fuels Standard Rulemaking. We are appreciative of your leadership and passion for advancing low carbon alternative fuels. It should be noted that the Washington State Clean Fuels Standard will be the single best tool for advancing such fuels and the WWCC, with its below comments, intends to further support the program by refining and adding specific aspects which improve credit generation and reduce greenhouse gases in the State of Washington.

We believe it is in the public interest to support public transit system infrastructure investments that promote mode shifts from private passenger vehicles to public transportation ridership. These investments and changes in personal mobility come hand-in-hand with reductions in carbon emissions from disincentivizing internal combustion engine-powered personal vehicle use. As such, we support language that allows public transit agencies the ability to generate multiplier credits for existing fixed guideway systems and their vehicles.

- 1) Ensure that public transit systems requiring ongoing public investment receive this support to encourage continued carbon reductions through strong public transit ridership through the State's Clean Fuels Standard multiplier credits. To accomplish this, please consider allowing the vehicles of fixed guideway systems to be included in the in-service year cutoff eligibility in addition to the fixed guideway systems themselves that meet the in-service date cutoff to generate multiplier credits. This is particular important for fixed guideway systems that do not frequently expand but require repeated financial, as well as political capital for reinvestment to ensure they and their ridership levels are maintained. It is in the public interest to maintain these systems for the carbon reductions they provide to our communities. Please consider the following inclusions in red:

*WAC 173-424-SRR. Specific Reporting Requirements (3)(e)(ii) Separated by electricity used in portions of their fixed guideway system or **their vehicles** placed in service before and after January 1, 2012.*

Western Washington Clean Cities Coalition

info@wwcleancities.org | P.O. Box 721, Street Tualatin, Oregon 97062 | www.wwcleancities.org



*WAC 173-424-CCD Calculating Credits and Deficits (2) Calculation method for fixed guideway vehicles and electric forklifts. For electricity used to power fixed guideway **systems or their** vehicles (Page 82)*

Incorporating these changes or otherwise improving the rule language clarity to allow for the public transit system or the vehicles of such systems to generate multiplier credits will a) help foster investments in transit system infrastructure to reduce carbon emissions through increases in transit service ridership, and b) help incentivize turnover of less-efficient transit system vehicles and investments in more fuel-efficient vehicles. These changes will also ensure continual investment in our existing transit systems and the carbon reductions these systems provide through supporting and expanding existing transit ridership.

The WWCCC is a 501 (c)(3) nonprofit organization and a part of a network of more than 80 communities within the US Department of Energy's Clean Cities Program working to advance sustainable transportation strategies for a healthy environment, robust economy, and a more secure energy future. Since 1998 our coalition has provided education, technical expertise, networking opportunities and funding assistance to help members invest in local, sustainable transportation solutions – which not only supports our regional economy and protects our environment, but can green a fleet's bottom line.

Please feel free to contact me with any questions and thank you *all* for your work on this program.

Yours Very Truly,

A handwritten signature in black ink that reads "Michael S. Graham". The signature is written in a cursive, flowing style.

Michael S. Graham
Coordinator, Western Washington Clean Cities Coalition
michael@cwcleancities.onmicrosoft.com
818.422.3415