

Rulemaking Lead  
Washington State Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503

Subject: Sound Transit Comments on Clean Fuel Standard Rulemaking Process

To Whom It May Concern:

The Clean Fuel Standard (CFS) program is a powerful tool to meet the state's climate goals by incentivizing use of fuels with lower carbon intensity and switching to modes of travel such as public transit. Sound Transit appreciates that the Department of Ecology is considering improvements to the program to further reduce Washington's GHG emissions and provide a stable price signal to reduce the carbon intensity of transportation.

Sound Transit has benefited significantly from the current CFS program, receiving approximately \$1.5 million to date. With active debate around the future of federal policy direction on climate and transit investments, bolstering the CFS to produce a more robust, predictable revenue stream is more important than ever to support the agency's zero emissions goals.

**Public transit is essential to Washington's achievement of its climate goals.**

Passengers who take transit save GHG emissions that would otherwise result from driving. Sound Transit's high-capacity transit is an environmentally preferable travel alternative that affordably connects people to jobs, education and healthcare across the region. In the aggregate, the agency provides significant regional greenhouse gas emission reduction benefits.

- In 2024, the agency's transit services including Sounder Commuter Rail, Sound Transit Express Bus Service and Link light rail displaced 255,000 metric tons of greenhouse gas emissions, equivalent to nearly five times the agency's operational greenhouse gas emissions.\* These emissions avoided are equivalent to those produced by consuming 29 Million gallons of gasoline or powering 227,000 electric vehicles for year.
- Link light rail also represents the fastest, most reliable low emission transit option in the state. Currently, operations on our 1 line are 100% carbon free and across the entire transit system, our electricity use is 88% carbon free.

**Sound Transit requests that the Department of Ecology dispenses with in-service cut-off dates for fixed guideway and other forms of transit.** The agency would like to see a credit generation methodology that makes no distinction between the electricity consumed by pre and post in-service cut off dates. This disparity diminishes our ability to generate revenue and reinvest in sustainable, clean-energy improvements from our pre-2023 projects. Sound Transit propels Link light rail passengers from point A to point B using clean

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electricity. The environmental benefit of this service to the region is not appreciably different once a train car passes from a 'pre-in-service cut-off' rail segment to a 'post in-service cut-off' rail segment.

Removing the in-service cutoff dates would enable Sound Transit to significantly increase its zero emissions investments. Performing a rough order of magnitude estimate, if all traction power (regardless of in-service date) received the benefit of the 3.3 EER value from the beginning of the CFS program, Sound Transit would have received an additional ~\$2.97M in revenue. From all credit generation sources under the actual regulation, total incentive revenue to date is ~\$1.5M, whereas if the framework made all traction power kWh worth the same amount of credits the value would have been \$4.51M.

**Sound Transit also requests the Department of Ecology better define “public transit infrastructure” and provide more detail on the types of electrified transit activities that are eligible to generate credits.** Along that theme are the following recommendations:

- Beyond traction power, there are critical aspects of light rail electricity consumption that Sound Transit believes merit consideration for credit generation eligibility. In addition to traction power, electricity consumption for station lighting, vertical conveyance and wayside infrastructure is necessary to ensure safe, reliable light rail service.
- The CFS should incentivize the adoption of zero emission railroad technologies in Washington State. Sound Transit requests that electricity used to charge or power zero emission locomotives qualify for credit generation like other battery-electric or hydrogen fuel cell transit vehicles under the CFS. Transit agencies, passenger railroads, and freight companies around the world are investing in and deploying battery-electric and hydrogen fuel cell trains to reduce fuel costs and mitigate diesel emissions.
- Additionally, Sound Transit encourages the Department of Ecology to consider station wayside power as a permissible credit generating activity. Wayside power technology is an important tool the agency uses to reduce diesel combustion and emissions. When Sounder commuter rail trains remain in station for extended periods during layovers, Sound Transit uses wayside power to electrically operate vehicle lights, HVAC, and doors, rather than the train's diesel hep (head end power) engine to run these items.

Thank you for the opportunity to better align this program with the goals and challenges transit agencies face. Sound Transit is committed to transitioning to zero-emission fleets, while also continuing to offer an affordable and climate-friendly alternative to single-occupancy vehicles.

Best regards,

Victoria Wassmer  
Deputy CEO  
Chief Finance and Business Officer

\*Methodology from [https://www.apta.com/wp-content/uploads/Standards\\_Documents/APTA-SUDS-CC-RP-001-09\\_Rev-1.pdf](https://www.apta.com/wp-content/uploads/Standards_Documents/APTA-SUDS-CC-RP-001-09_Rev-1.pdf)