



201 S. Jackson St. KSC-TR-0324
Seattle, WA 98104-3856

206-553-3000 TTY Relay: 711
www.kingcounty.gov/climate

March 3, 2026

Ms. Lauren Sanner
Department of Ecology
Climate Rulemaking Planner
Olympia, WA 98504-7600

Submitted online via:

https://ecology.commentinput.com/?id=HreYsPb4D&utm_medium=email&utm_source=govdelivery

Re: Chapter 173-424 WAC and WAC 173-455-150, Clean Fuels Standard Rulemaking
Informal Comment Period

Dear Ms. Sanner and Department of Ecology CFS Rulemaking staff:

Thank you for the opportunity to comment on the scope of Clean Fuels Standard rulemaking and provide input on the proposed draft rule. The Clean Fuels Program is a powerful tool to meet the state's climate goals by incentivizing use of fuels with lower carbon intensity and accelerating the transition to a clean energy economy.

Confronting climate change and reducing emissions from the transportation sector are top priorities in King County's newly adopted 2025 Strategic Climate Action Plan (SCAP). The 2025 SCAP is a five-year blueprint for County climate action, sets ambitious targets to reduce emissions by half by 2030, lead with climate justice, and prepare for the impacts of climate change. Transportation is the largest source of greenhouse gas emissions in King County, and Washington State, and we must take urgent and immediate action to lower emissions from that sector. King County is supportive of efforts to strengthen Washington state climate policies, including the Clean Fuels Standard carbon intensity targets. King County appreciates that the Department of Ecology is considering updates to harmonize the rule with California and Oregon's clean fuel programs.

The Washington Clean Fuels Program is supporting King County's efforts to reduce emissions from County fleets via electrification and use of renewable fuels. King County has generated Clean Fuel Program credits from fueling of County fleets with electricity since the program began in 2023. King County values the opportunity to use revenue from the sale of Clean Fuels Program credits to reinvest in efforts to provide services to residents using zero-emission vehicles. Both Metro Transit, Fleet Services, and the Solid Waste Division are expanding purchase and use of renewable diesel fuels in County fleets. Metro Transit has committed to fuel the entire bus fleet with renewable diesel. The transition to renewable diesel is anticipated to reduce emissions from Metro's hybrid bus fleet by 60% in 2026. The Clean Fuels Program has contributed to making renewable diesel more cost competitive with fossil fuel diesel, making it easier for the County to switch to renewable diesel.

We thank you for your work to date to make this program a success and for your continued work to enhance the Department of Ecology's proposed rule to increase alignment with other Clean Fuels Programs in the region.

King County asks the Department of Ecology to incorporate the following recommendations into the scope of the proposed rulemaking and draft rules for public comment:

1. **Ensure ongoing public investments in fixed guideways systems generate equivalent credits to investments in new fixed guideway systems.** It is in the public interest to maximize credit generation for public transportation that is zero-emission and shifts load from passenger vehicles to public transportation. Fixed guideways systems (such as Metro's trolleybus fleet, which is an overhead catenary system bus powered by electricity with a battery for limited off-wire travel) require significant ongoing investment in the system and vehicles. New investments in vehicles and systems result in efficiency improvements that should be reflected in credit generation. For example, in 2015, the new, electric trolley bus fleet Metro Transit purchased improved electricity efficiency by 20% as a result of regenerative braking functionality. Metro received a rebate from Seattle City Light for that efficiency improvement.

Electric trolley buses are an essential part of King County Metro's zero-emission fleet and Clean Fuels Program credits can help stabilize funding to support ongoing use of this zero-emission technology given the uncertainty in federal funding for public transit and zero-emission technology. When electric trolley buses cannot be used on designated routes due to construction and special events, they are currently replaced with diesel-hybrid buses. Thus, these electric trolley buses should be treated as diesel-hybrid bus replacement, equivalent to a battery electric bus, regardless of the date they went into service.

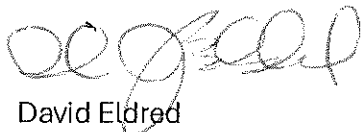
We appreciated Ecology's amendment to the rule to align with CARB by eliminating the model year exclusion and to remove the requirement to report on fixed guideway separately by model year. We recommend that Ecology further amend the rule so that **zero-emission electric trolley buses are treated the same as zero-emission battery electric buses, with an EER of 5.** Ecology responses to rulemaking comments in 2025 suggested that Ecology would consider this amendment in future rulemakings.

2. **Enhance Capacity Credits for Heavy-Duty EVs:** These credits, also known as Fast Charge Infrastructure (FCI) credits for heavy duty EVs, are meant to improve the business case for DC fast charging. King County supports adding these credits in this rulemaking but believes they should be expanded to individual fleets not just fleets where two or more entities use the same charging depot. Specifically, we request that the Department of Ecology follow CARB's example and provide these to "private fleets" and use the formula that CARB uses, which allows half the credit compared to shared depots and truck stops.
3. **Regular reporting of emissions factors for renewable fuels sold in Washington.** King County is increasing use of renewable diesel fuel in fleets. To support GHG inventory reporting and quantifying the emissions reduction benefit of renewable fuel purchasing there is interest in having Washington specific emissions factors for renewable fuels. Renewable fuels report and register carbon intensities when sold in

Washington, however fuels are blended when sold to consumers and King County is unable to obtain an emissions factor specific to fuel purchased. It would be helpful to have Ecology report an average emissions factor by renewable fuel type for Washington based on information reported on volumes and carbon intensity of renewable fuels sold in Washington. This may already be available, and if so we would appreciate information on where to find the values and how regularly data is updated.

Thank you for your continued partnership in furthering Washington state's emissions reductions goals.

Sincerely,

A handwritten signature in dark ink, appearing to read "David Eldred". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Eldred".

David Eldred
Chief Administrative Officer