



WSTA Members

- Asotin County Transit
- Ben Franklin Transit
- C-TRAN
- Central Transit
- Clallam Transit
- Columbia County Public Transportation
- Community Transit
- Everett Transit
- Garfield County Public Transportation
- Grant Transit Authority
- Grays Harbor Transportation Authority
- Intercity Transit
- Island Transit
- Jefferson Transit
- King County Metro
- Kitsap Transit
- Lewis County Transit
- Link Transit
- Mason Transit Authority
- Pacific Transit
- Pierce Transit
- Pullman Transit
- RiverCities Transit
- Skagit Transit
- Sound Transit
- Spokane Transit Authority
- TranGo
- Valley Transit
- Whatcom Transportation Authority
- WSDOT – Division of Public Transportation
- Yakima Transit

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Climate Pollution Reduction Program
PO BOX 47600
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Subject: Chapter 173-424 WAC and WAC 173-455-150 - Clean Fuels Program Rule and Clean Fuels Program Fees

To Whom It May Concern:

These comments and recommendations are submitted on behalf of the Washington State Transit Association (WSTA) and its members regarding proposed Rules under consideration for Chapter 173-424 WAC and WAC 173-455-150, Clean Fuels Standard.

WSTA is a nonprofit Associations with 30 transit agency members and the WA. State Dept. of Transportation. WSTA's rural and urban membership ranges with our largest member, King County Metro with a \$1 billion operating budget to our smallest, Garfield County Transportation, with an operating budget of just \$400,000. This diversity in membership provides hundreds of millions of annual boardings on fixed route, demand response, vanpool, commuter and light rail and passenger only ferry. That ridership is bolstered by the first and only state in the nation offering free transit rides to youth, Washington has over 14 million riders aged 18 and under.

1. Credit the Full GHG Value of Transit Service

Transit agencies move people out of personal vehicles. The current EER does not reflect that - it compares an electric bus to a diesel bus and stops there. The actual emissions benefit is larger: riders who would otherwise be driving, land-use patterns that reduce trip distances, lower rates of vehicle ownership in transit-served corridors. None of that is captured today.

We understand Ecology wants Washington-specific data before revising the transit EER. We are willing to work toward that and can contribute operational data from our systems. But the CFS uses national and regional data as proxies elsewhere in the program, and existing research already covers the Seattle region. We encourage Ecology not to set a higher bar here than it applies to other fuel pathway calculations.

WSTA Recommendation: Revise the transit EER to reflect mode shift from personal vehicles and the broader travel-behavior effects of transit service. Work with transit stakeholders on methodology; do not require a Washington-only study as a precondition.

2. Allow Transit Agencies to Earn Capacity Credits for Depot Charging

The FCI (Shared) pathway requires a site to serve three distinct fleets. Transit depot charging serves one fleet by design: access is controlled, infrastructure is operationally integrated and opening it to outside operators is not a realistic option for any of our member agencies. The result is that transit agencies are effectively excluded from capacity credits regardless of how much charging infrastructure they install.

WSTA Recommendation: Create a capacity credit pathway for single-fleet heavy-duty charging infrastructure.

3. Raise the Advance Credit Cap

The current 5% cap on advance credits produces a program pool of roughly \$1–2 million per year. Fleet electrification and depot charging projects run well into the tens of millions. The cap, as set, is too small to influence agency capital decisions. WSTA members can provide project-level capital cost data to help Ecology size the program appropriately.

WSTA Recommendation: Raise the advance credit cap to at least 20–30% of prior-year deficits.

4. Align the Trolley Bus EER with the Battery Electric Bus EER

Trolley buses receive an EER of 2; battery electric buses receive a 5. Trolleys draw power directly from overhead lines without the charging and storage losses that BEBs incur. The technical basis for the gap is unclear. Ecology acknowledged at the workshop that it does not yet have documentation for it. For agencies operating trolley networks, the lower EER is a direct revenue penalty on existing zero-emission infrastructure.

WSTA Recommendation: Set the trolley EER equal to the BEB EER.

WSTA appreciates the opportunity to provide input and comments on the Rulemaking Process. If you have any questions regarding these comments, please do not hesitate to contact me. Thank you for considering our perspectives and suggestions.

Sincerely,



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