



July 7, 2015

Peter Moulton
Washington Department of Commerce
P. O. Box 42525
Olympia, WA 98504

Dear Peter,

Community Transit is a long-standing member of the Washington State Transit Association (WSTA). As such, we work very closely with that agency on all matters affecting transit in the State of Washington. We have done so with great respect to the evaluation of and recommendations for the Proposed Rules for Use of Alternative Fuels and Vehicles by Local Governments – Chapter 197-29 WAC.

We thank you for your previous consideration and inclusion of recommendations brought forth by WSTA and included in the current draft rules. Additional comments or recommendation to the current draft are provided in WSTA's formal response to the Department of Commerce that we fully endorse.

WSTA's response includes both support for retaining those requested provisions that have already been included in the proposed rules, as well as additional recommendations for your consideration. Community Transit fully supports revisions pertaining to the Social Cost of Carbon and Transit Offsets, the Determination of Practicable and Lifecycle Cost, and the Comparison of Vehicles that are included and defined in the WSTA response.

Thank you for allowing us the opportunity to review the Proposed Rules for Use of Alternative Fuels & Vehicles by Local Governments, and for your consideration of WSTA's comments and recommendations.

Respectfully yours,

Emmett Heath
Chief Executive Officer

Cc: Geri Beardsley, WSTA