

Linda Kildahl
Department of Ecology
Air Quality Program
Olympia, WA 98504-7600

RE: Natural Resources Defense Council Comments on Hydrofluorocarbon Regulation

Dear Ms. Kildahl,

The Natural Resources Defense Council (NRDC) would like to commend the Department of Ecology for their prompt action to reduce greenhouse gas emissions from hydrofluorocarbons (HFCs). We appreciate the opportunity to participate as a stakeholder in the rulemaking process and would like to express strong support for the proposed regulation.

NRDC is a non-profit environmental organization with a network of 3 million members and online activists and more than 650 lawyers, scientists and policy advocates working to protect our environment and ensure that everyone has access to clean air, water and the wild. Within our Climate & Clean Energy Program, we have worked for several decades to end the use of refrigerants that deplete stratospheric ozone and cause climate change.

On behalf of NRDC's more than 100,000 members and online activists in Washington, NRDC would like to express strong support for the proposed regulation and encourage its prompt adoption.

Ever since EPA's Significant New Alternatives Policy (SNAP) rules 20 & 21 were partially vacated, states have been filling in the gap left by the federal government. Currently, it is the state-level prohibitions that are leading the industry's transition to climate friendlier alternatives, providing significant greenhouse gas emissions reductions. We commend Washington for being at the forefront of action on HFCs and encourage swift adoption of the proposed regulation. These prohibitions are critical for reducing HFC emissions across the U.S. and incentivize a transition toward climate-friendlier alternatives in sectors where substitutes already exist.

NRDC strongly encourages the Department of Ecology to adopt the transition schedule as proposed. The proposed schedule is aligned with that of other U.S. Climate Alliance states and thus will avoid a regulatory patchwork. This will facilitate enforcement and ease the compliance burden on manufacturers and distributors.

NRDC is in strong support of the proposed regulation and we thank the Department Ecology for the opportunity to weigh in.

Sincerely,

Christina Theodoridi
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Natural Resources Defense Council
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