

City of Seattle, Office of Sustainability and Environment

The City of Seattle's Office of Sustainability and Environment appreciates the opportunity to comment and wishes to submit the following for your consideration:

-The CCA specifically states "In developing the objective criteria under this subsection, the department must consider the locations of facilities potentially identified as emissions intensive, trade-exposed manufacturing businesses relative to overburdened communities." To that end, we request that Ecology include the Department of Health Environmental Health Index data as part of the criteria for evaluating and deeming a petitioning manufacturer as an EITE. The draft rule simply requires petitioners to submit data. Because EITE's are granted no-cost allowances, communities with a high health disparity index may not see real or significant emission reduction action taken by the manufacturer(s) who are located in their communities.

-Require that manufacturers who petition Ecology for EITE designation and are granted that designation, provide data on an annual basis to maintain their designation status.