



King County

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King County Executive

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January 27, 2022

Cooper Garbe
Rulemaking Lead
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: King County comments on Cap-and-invest program structure (WAC 173-446)

Dear Mr. Garbe:

Thank you for the opportunity to submit comments and recommendations on the Department of Ecology's ("Department" or "Ecology") January 11th cap-and-invest discussion draft rule (WAC 173-446).

King County appreciates the Department's work to advance the cap-and-invest structure. Accelerating the transition to a clean energy economy and confronting climate changes are top priorities set forth in King County's 2020 Strategic Climate Action Plan (SCAP), a five-year blueprint for County climate action, integrating climate change into all areas of County operations and work with King County cities, partners, communities, and residents. King County is broadly supportive of what has been proposed in these rules, provided that the allowance structure maximizes investments in clean energy programs, and negative impacts are mitigated to communities most impacted by climate change. King County offers the following recommendations for Ecology to incorporate into the proposed rule:

- 1. Maximize funds generated and benefits achieved from cap-and-invest structure:**
As part of its SCAP commitments, King County is developing new energy programs to reduce emissions and energy burden on frontline and underserved communities; implementing strategies to achieve zero waste; planting, protecting, and preserving 3 million trees by 2025; reducing transportation related emissions through increased transit and thoughtful growth management policies that lessen dependency on car travel; leading the way on green building and electric vehicles, and working with community to develop policies and investments that improve resilience. These actions can be accelerated to achieve deeper impacts in partnership with state policies and state directed resources. King County asks that Ecology design the structure to

maximize resources for these programs and ensure revenues maximize opportunity to address the climate crisis and climate justice.

2. **Include local governments as ongoing advisors to cap-and-invest implementation:** As the Climate Commitment Act (CCA) rules are developed and implemented, we request local governments are included as key stakeholders and partners in the development and deployment of solutions. King County staff and leadership look forward to and stand ready to engage in various CCA workgroups and rulemaking opportunities as the price-setting, allowance and offset guidelines work advances.

We look forward to continuing partnership with the Department on the development of these important rules. If you have any questions, please do not hesitate to reach me at (206) 263-9633.

Sincerely,

A handwritten signature in blue ink, appearing to read 'RB', followed by a long horizontal flourish.

Rachel Brombaugh
Director of Climate and Energy Initiatives
Office of King County Executive