

Virginia Davis

Thank you for the opportunity to comment on WAC-173-446, Climate Commitment Act (CCA) Program Rule.

I appreciate the hard work the Department of Ecology has been doing to implement the CCA. However, I have a concern related to the following area of the draft program rule.

Environmental Justice Council

The timeline for implementing the CCA does not allow the Governor's newly formed Equity and Justice Council (EJC) adequate time to understand the CCA program, or its social and environmental context. The draft program rules should define how Ecology will engage with and support the EJC in the development, implementation, and evaluation of the full program.

Ecology needs to define when and how they will provide the EJC details about the CCA program, including:

- * Air-quality monitoring program data, especially data related to emissions-intensive, trade-exposed (EITE)-adjacent, overburdened communities
- * Method for how pollution allowances will be administered to ensure overall declining greenhouse gas (GHG) emissions under the cap, the appropriate amount of revenue generation from auction activity, and the overall health and integrity of the cap and invest program
- * Criteria for the selection of offset protocols, including risks and benefits, and how the definition of adverse impacts relates to the rule definition of "environmental harm"
- * What decisions will be needed to facilitate linkage with other pollution reduction programs, as well as the predicted or possible downstream consequences of those decisions.

Thank you for considering my concerns.