

## Kjellen Belcher

Thank you. My name is Kjellen Belcher, spelled K-J-E-L-L-E-N B-E-L-C-H-E-R. And I'm commenting on behalf of Environmental Defense Fund. Thank you for the opportunity to comment on the proposed rules for the climate commitment acts cap and trade program. EDF represents over 3 million members and activists across the country including over 100,000 in Washington state. EDF has extensive experience designing carbon limits and greenhouse gas emissions reduction policy in US states and around the world. We bring this expertise to bear on our comments today. The passage of the climate commitment act last year solidified Washington state as a national climate leader and made Washington only the second state in the country to place a binding, enforceable, declining limit on greenhouse gas emissions across the economy. At a critical moment for climate action, Washington is building momentum and providing a model for ambitious climate policy that can deliver. We commend the department of ecology for the work that they have done to design a program that can both maintain environmental integrity of the program's cap on emissions and preserve Washington's ability to link with other jurisdictions. We encourage ecology to consider seeking alignment with the Western Climate Initiative where necessary to better facilitate linkage between programs in the future. We also encourage ecology to ensure that Washington's program has a functional emissions containment reserve by providing an emissions containment reserve trigger price in the rule. The emissions containment reserve is an important policy design feature that can increase the environmental ambition of the program in a scenario where allowance prices are lower than expected and does so in a way that is transparent, supports price stability, and creates environmental benefits. Lastly, we want to emphasize the importance of ensuring that implementation details in the rules such as timelines and processes for auctions and allowance allocations are clear and workable for all stakeholders. We will provide additional detail in our written comments. Thank you so much for your time and consideration and for working to make Washington's nation-leading policy into an ambitious, effective, enforceable program that puts the state on a pathway to meet its climate goals. Thank you.