

Ruth Fruland

Dear Mr. Grice, In 1970, as a NASA geologist, I studied samples from the Moon and celebrated the very first Earth Day. What a contrast between planetary environments! Substitutes for Earth – none. Substitutes for fossil fuels – many. In 1973, I read “The Limits to Growth.” I watched the Business As Usual (BAU) scenario unfold. In 1986, I was working as an environmental geologist at the Hanford when American and Soviet leaders decided to end the Cold War. Hanford changed on a dime - from producing plutonium to restoration and remediation of the radioactive wasteland we ironically created in our own country, not the enemy’s. In 2021, the Northwest experienced the deaths of hundreds of people and an estimated billion of marine fauna due to a heat dome (that’s a thing?). These emerging catastrophes are not one-offs. Planetary conditions are rapidly deteriorating. I agree with the critique of the WAC-173-446 Climate Commitment Act (CCA) Program rule draft provided the Community Energy reSource organization, and documented in their report entitled "Exposing False Solutions: How Washington's Cap and Trade Program Gives Industrial Polluters a Free Pass." The WAC Program Rule draft is astonishingly weak on lowering carbon emissions. Exempting the majority of EITEs from incentivizing rules (3% is trivial, insulting even). The draft smacks of being much more influenced by industry and polluters rather than citizens, human health concerns, environmental degradation, and climate scientists. The former have created the problems, have they not discredited themselves many times over? I also agree with the "spot on" comments provided by Seattle's 350.org (such as more time to understand the rules and their consequences, flawed offsets allowing pollution to continue, inflated emissions reduction estimates, inadequate oversight of Utilities, unsupported claims such as “working forests” that do not provide the trillions of dollars in ecological services that natural forests do). To be most effective, any forestry offset protocol used by Washington State should reward the avoidance of industrial forest practices, • Incentivize longer harvest rotations. • Prioritize the protection of old growth and mature forests. • Evaluate carbon storage and overall forest health together. I hope that you can see the writing on the wall and change the rules accordingly. Thank you for reading.