

Kristin Edmark

Thank you for your work to implement the Climate Commitment Act. Please make sure that the rule is strengthened to ensure benefits to overburdened communities are actualized; the states' tribal consultation obligations are met; the carbon market functions with transparency and integrity; and there is adequate information to guide adaptive management of the program. I am especially concerned that cap-and-invest program avoids negative impacts to overburdened communities.

Please clarify Ecology's role in evaluating impacts of all Emission-Intensive Trade-Exposed facilities (EITEs) on overburdened communities.

Provide guidance and establish reporting requirements for consumer-owned utilities on the use of the value of no cost allowances and engage with the UTC on its regulation of investor-owned utilities' use of the value of no cost allowances, regardless of when each facility becomes a covered entity.

Require EITEs applying for an upward adjustment of no cost allowances to submit information on any excessive environmental impacts of the fuels, processes, and equipment used by each facility. The rule should be clear that if the facility is found to create excessive environmental impacts, upward adjustments should be denied.

Please ensure that offsets are adaptable and actually decrease carbon emissions. I support strong implementation. Thank you for this important work.