

# Paul Gould

Comments regarding WAC 173-446 Climate Commitment Act Program(CCAP)

General comments:

Implementation of any program or taxing scheme to reduce our carbon footprints and reduce the rate of climate change impacts, must be fair, equitable and not further contribute to this State's highly regressive tax system. The costs incurred from our journey away from a carbon based energy driven economy must be largely born by the industries and systems that are contributing to the problem and not born by those with the least ability to afford the changes that will be required to meet our goals.

We need to address all transportation sectors, including road, rail, marine and aviation. It appears that numerous industries and sectors of the economy are being excluded from the CCAP in such a way that they have little to no incentive to make improvements in their impacts to climate change.

EITS Industries

The no cost allowances for the 13 EITS industries seem problematic. Many of these are heavy carbon emitters and it seems like there should be a better way to incentivize businesses in this category to significantly reduce their carbon impact while allowing them to profitably operate in this state.

To massively increase fuel taxes on auto fuel, heavily impacting regular citizens while giving a free pass to heavy carbon industries, seems to lack fairness and equity and further increases our already regressive tax system. There has to be other alternatives to the proposed method that others have suggested that would not levy undo hardship on business competitiveness while still providing incentives to reduce their carbon emissions.

Offset/allowances alternatives

In lieu of paying directly for allowances (or providing no-cost allowances) I think some alternatives should also be considered.

1. Contributions to re-forestry efforts on state lands. I have to assume there is a significant number of acres across the state on DNR lands that needs to be reforested.
2. Incentivize utilities to heavily subsidize rooftop solar and heat pumps for homeowners.

Incomplete measure/accounting of carbon emissions.

For utilities the whole path from extraction to energy production should be measured and included. The Process of natural gas extraction and transmission thru gas pipelines produces a significant amount of methane. This needs to be addressed and included in the calculations.

One of the stated key benefits of doing this process is to improve air quality. Yet, as a person living in one of the SeaTac airport communities, I am disheartened that still nothing is being done to address air quality issues related to airport operations and the burning of aviation fuel. There has been recent studies showing the negative health effects due to air quality problems around airports.

It seems ironic that one of the main stated purpose of the program is to reduce our overall carbon emissions and improve air pollution, yet we are exempting from the program most of the key industries that heavily impact the people living near those facilities and operations. It appears like we are going to heavily impact and burden ordinary citizens, yet let some of our biggest source point polluters mostly, if not completely off the hook. Doesn't look very much like an equitable distribution of incurred cost of this program. If all sectors of the economy are not participating fairly and equitably in this process to decarbonize our economy, there will be challenges in getting compliance and buy in by the general public.

Just as motor fuel is being taxed and going to go up significantly, Aviation fuel consumption and marine fuel consumption should be taxed using the same methods. Fuel for pleasure boats should be taxed and accounted for like automobiles and trucks.

Application of generated funds from the CCA program.

The state currently waves the sales tax on roof top solar installations. I don't know about heat pumps.

With some of the generated funds from the CCA program, there should be a strong push towards making homes and business more energy efficient. Helping to substantially fund rooftop solar, energy efficient windows and doors, electric heat pumps, insulation and weatherization improvements all should be made much more readily available and affordable for all household income levels.

Additional use of CCA funds

1, Incentivize/subsidize more rapid adoption of plug-in electric vehicles

2. Help fund/subsidize EV charging stations in home and multi-family housing complexes

Encourage more rapid build out of public EV charging stations across the state

3. To reduce emissions from the transportation sector, please explore and begin build out of "Solutionary Rail"network, to begin a transition from diesel trucks and freight trains to an electrified rail system. Much of the European rail system is electrified and it is an embarrassment that our rail system is so antique and inefficient. There is significant progress that can be made there.

<https://www.solutionaryrail.org/>