

# Nance Epstein

Washington made history by passing the country's strongest law capping carbon pollution, the Climate Commitment Act (CCA). As a resident of the state, I am eager to see the benefits including deep reductions in climate pollution, improved air quality, investments in clean transportation and clean energy, community benefits with investments in overburdened communities, and much more. In order for the CCA to be truly transformational for Washington and act as a model for other states, it is critical that the proposed rule do the following.

CCA rules must maintain the integrity of the cap. The ultimate goal of this law is to achieve our greenhouse gas limits and improve air quality, especially in overburdened communities. Ensuring that emissions do not exceed the cap is critical. When designing program details, maintaining the cap should be one of the primary goals.

CCA investments must prioritize significant improvements in air quality of overburdened communities, especially Black, Indigenous and communities of color. For too long, these communities have borne the brunt of air pollution and climate impacts. The CCA requires that a minimum of 35% of overall investments directly benefit these communities. These investments must be thoughtfully designed with community input to ensure benefits are meaningful.

CCA's implementation process must collaborate with the Environmental Justice (EJ) Council and with overburdened communities. The rule should provide more clarity on how the Council and communities will be engaged in the development and implementation of the full program. Ecology should work with the EJ Council to determine the best processes for collaboration.

Thank you for considering my comments.

Sincerely,  
Nance D. Epstein