

Rosemary Sweeney

Hi, my name is Rosemary Sweeney, uh, spelled R-O-S-E-M-A-R-Y S-W-E-E-N-E-Y. I'm testifying on behalf of myself. And, um, so, uh, in-in the informal questions I asked about, um, how the department was planning on ensuring that offsets were additional. I don't know that I actually got a answer on that, but, uh, the representative did comment that the cap is not increased by the use of offsets, which-- and that's true under this statute. I wasn't able to think fast enough to respond to that, but on-on reflection. Um, so that would kind of maybe imply that it doesn't matter whether offsets are additional because the cap is not increased, but, um, offsets can be used as compliance instruments just like allowances. So if you, um, register offsets and allow them to be used for compliance that are not truly additional, the cap, although the cap may not in name, be increased by the use of those offset, it will be functionally increased. If you have offsets in the system that are not additional. So, and-and this coupled with that last section of the rules that specify that, uh, you know, in 2031 and beyond, we're gonna have still, uh, up to 6% offsets can be used for compliance. Um, it's important that we get, uh, some kind of a rule in place to-to enforce additionality a little better than California because there's so many public publicized cases in California where offsets are clearly not additional. So, um, I-I just would like Ecology to, you know, put some thought into this and try to come up with something that'll solve this problem.