

League of Women Voters of Washington

Thank you for accommodating additional public comments on this rulemaking process described in Revised Preliminary Regulatory Analyses, May 2022, Publication 22-02-019. The League of Women Voters of Washington considers the opportunity for citizens to express their views in making laws an essential feature of our democracy.

Rule making on Chapter 173-446 WAC should maintain transparent processes and policies for assessing progress, making adjustments, and prioritizing investments in carbon reducing investments and reducing health disparities in frontline and overburdened communities. These communities need both healthier air and reasonable utility rates. Priorities should also include weatherization, decarbonization, conservation, and efficiency improvements as the opportunities for these benefits are not always available to them.

While policy stability and consistency is important for efficient policy implementation and compliance, policy adjustments will be required as the markets respond and technologies emerge and mature. The adopted rules should not hinder adjustments needed over time.

We agree with other organizations that accurate forecasting is required and should be integrated with other policies, such as the Clean Energy Transformation Act, to ensure efficiency of oversight and compliance.

Please also consider this specific concern.

RCW 70A.65.230 Investments—Legislative intent—Evaluation stipulates that a minimum of not less than 35 percent and a goal of 40 percent of total investments that provide direct and meaningful benefits to vulnerable populations within the boundaries of overburdened communities [and] a minimum of not less than 10 percent of total investments that are used for programs, activities, or projects formally supported by a resolution of an Indian tribe. RCW 70A.65.280 stipulates that not less than \$20,000,000 per biennium be dedicated to the air quality and health disparities improvement account.

Ensure that the language and chronology in section 2.4.1 Use of auction revenues ensures this minimum level of investment is met or exceeded.

The League of Women Voters of Washington believes:

- The quality of the environment should be a prime consideration when making economic decisions. The environment should not be permitted to degrade.
- Climate change is a serious threat facing our nation and our planet.
- An interrelated approach to combating climate change—including through energy conservation, air pollution controls, building resilience, and promotion of renewable resources—is necessary to protect public health and defend the overall integrity of the global ecosystem.
- The League supports climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations.
- Individuals, communities, and governments must continue to address this issue, while considering the ramifications of their decision, at all levels—local, state, regional, national, and global.

Martin Gibbins

Climate Change & Energy Issues Chair
League of Women Voters of Washington



July 15, 2022

Joshua Grice
Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Thank you for accommodating additional public comments on this rulemaking process described in Revised Preliminary Regulatory Analyses, May 2022, Publication 22-02-019. The League of Women Voters of Washington considers the opportunity for citizens to express their views in making laws an essential feature of our democracy.

Rule making on Chapter 173-446 WAC should maintain transparent processes and policies for assessing progress, making adjustments, and prioritizing investments in carbon reducing investments and reducing health disparities in frontline and overburdened communities. These communities need both healthier air and reasonable utility rates. Priorities should also include weatherization, decarbonization, conservation, and efficiency improvements as the opportunities for these benefits are not always available to them.

While policy stability and consistency is important for efficient policy implementation and compliance, policy adjustments will be required as the markets respond and technologies emerge and mature. The adopted rules should not hinder adjustments needed over time.

We agree with other organizations that accurate forecasting is required and should be integrated with other policies, such as the Clean Energy Transformation Act, to ensure efficiency of oversight and compliance.

Please also consider this specific concern.

RCW [70A.65.230](#) Investments—Legislative intent—Evaluation stipulates that a minimum of not less than 35 percent and a goal of 40 percent of total investments that provide direct and meaningful benefits to vulnerable populations within the boundaries of overburdened communities [and] a minimum of not less than 10 percent of total investments that are used for programs, activities, or projects formally supported by a resolution of an Indian tribe. **RCW [70A.65.280](#)** stipulates that not less than \$20,000,000 per biennium be dedicated to the air quality and health disparities improvement account.

Ensure that the language and chronology in section *2.4.1 Use of auction revenues* ensures this minimum level of investment is met or exceeded.

The League of Women Voters of Washington believes:

- The quality of the environment should be a prime consideration when making economic decisions. The environment should not be permitted to degrade.
- Climate change is a serious threat facing our nation and our planet.
- An interrelated approach to combating climate change—including through energy conservation, air pollution controls, building resilience, and promotion of renewable resources—is necessary to protect public health and defend the overall integrity of the global ecosystem.
- The League supports climate goals and policies that are consistent with the best available climate science and that will ensure a stable climate system for future generations.
- Individuals, communities, and governments must continue to address this issue, while considering the ramifications of their decision, at all levels—local, state, regional, national, and global.

Martin Gibbins
Climate Change & Energy Issues Chair
League of Women Voters of Washington