

March 17, 2021

Dear Director Watson, Diane Butorac & Fran Sant,

Thank you for the time and attention Department of Ecology is spending on the GAP rulemaking. We are excited about the opportunity to continue to engage with you to create a rule that adequately addresses the impacts of greenhouse gas emissions in our state, while centering the communities most impacted by those emissions.

In order to maximize public participation in the process. We would like to make the following requests of the rulemaking process.

- -A formal public comment period that lasts 60 calendar days.
- -Several public hearing times and dates that allow for folks who work or care for others to participate. This is particularly important during COVID-19. Please include a daytime and evening session.
- -A public hearing format that accounts for folks who do not have access to the internet. This would look like a dial in option.
- -A public hearing format that does not deter participants by requiring them to wait for long periods of time without knowing when they will have the opportunity to testify. We recommend announcing the next ten speakers and having a screen up with the names of those next ten people for participants to view on their screen. Assigning numbers to participants as they register could also help in this process.
- -A public hearing format that honors elected officials of any capacity, and in particular elected leaders of Tribes and First Nations, as well as Tribal members, to be first in line to give testimony.
- -A public hearing format that allows those who are not fluent in English speaking and/or comprehension to engage. This could include a minimum of a Spanish translation for any presentation or direction from Ecology throughout the hearing.
- -A public hearing format that uses closed captioning and sign language to maximize accessibility for all.
- -A public hearing format that gives testifiers three minutes to make their comments. In the case that time is cut to allow for large number of participants, testimony time will remain at a minimum of two minutes

- -A public hearing format that allows participants to see the Ecology staff who are running the meeting and listening to testimony.
- -A public hearing format that allows for participants giving testimony to be seen, if they so choose by other attendees.

We strongly believe these recommendations will allow a more equitable opportunity for people to engage in the comment period and public hearing for the GAP rule.

We thank you again for your consideration and look forward to hearing from you on these points.

Best,

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Sierra Club
Co-Lead, Power Past Fracked Gas

Anna Doty
Fossil Fuel Campaign Manager
Washington Environmental Council

Brent Lyles
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Friends of the San Juans

Nick Manning Climate Program Organizer Washington Physicians for Social Responsibility

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