

Brandon Bowersox-Johnson

Dear Rulemaking Lead Fran Sant,

As a former city council member and a parent, I know that the scientific consensus has changed quickly, and it will test our government's ability to make policy and regulations to act fast enough to save a livable planet for my son and future generations.

But the science is now clear that Washington State and the world must dramatically reduce emissions. Every new fossil fuel project should be evaluated based on the latest science and the full life-cycle emissions it would enable. We must begin to consider the health and climate impacts for local populations, Indigenous communities, and the ecosystems that sustain us all.

Please ensure that the new rules do 3 major things:

1. Acknowledge and uphold Treaty rights. Engage in meaningful consultation, and fulfill the trust responsibility to protect and preserve the natural ecosystems and resources.
2. Include community health assessments. Understanding the impacts to Washington communities and communities, potentially affected by any part of the project's life cycle, must be a prerequisite to good decision-making by permitting authorities.
3. Safeguard communities from inadequate assessments. Create prerequisites that would preclude agencies with conflict of interest, e.g. monetary interest in a project, from being in charge of the permit process as lead SEPA agency. Accountability is critical for ensuring accurate and full analysis.

Ecology's Greenhouse Gas Assessment (GAP) rule comes at a critical time, as the harm from climate change becomes increasingly evident. Wildfires, decreased snowpack, and sea level rise threaten the very existence of our communities. These harms will fall hardest on the people who already bear a disproportionate share of our environmental burdens.

Please also ensure that the new rules include these 5 aspects:

1. Require a climate test based on the best available science to assess each project's impacts.
2. Require assessment methods of a project's full lifecycle carbon footprint.
3. Include strong, enforceable mitigation requirements grounded in equity and with an aim of reducing emissions.
4. When evaluating methane emissions, the more potent 20-year impact value should be used, in recognition of the International Panel on Climate Change identifying a timeline of less than a decade to make the unprecedented changes needed to avoid climate catastrophe.
5. Cumulative impacts must be included in the decision-making process, meaning that the emissions of new or revised construction shall not be analyzed by itself, but must include the gross emissions of all emissions in the region with the impacts to the residents.

Please consider my son and our future generations and the ecosystems that are already on the brink of collapse--from our salmon and orca to the glaciers and weather patterns that are already becoming unstable. Please check that all eight items above are taking into account in the new rules.

