

# Earthjustice

July 28, 2021

Via Public Comment Portal, [ecology.wa.gov](http://ecology.wa.gov)

Fran Sant

Rulemaking Lead, GAP Rule

Department of Ecology

PO Box 47600

Olympia, WA 98504-7600

RE: Request for 90-day comment period on Proposed Rulemaking for Chapter 173-445 WAC, Greenhouse Gas Assessment for Projects (GAP) Rule.

Dear Ms. Sant:

Thank you for the opportunity to participate in the development of Ecology's Greenhouse Gas Assessment for Projects (GAP) rulemaking. Ensuring complete and equitable mitigation for large fossil fuel and industrial projects is critical to preventing catastrophic climate change and decreasing environmental inequities. The GAP Rule will govern how large industrial and fossil fuel projects assess and mitigate their greenhouse gas emissions under the State Environmental Policy Act (SEPA). For that reason, it is critically important to provide the public with ample opportunity to comment and provide feedback on the proposed rulemaking.

As organizations actively engaged in pushing for the most health protective and environmentally responsible rule, we request a 90-day comment period upon publication of the proposed GAP rule to allow ample time for public engagement. Members and supporters of the below-signed organizations are interested in actively engaging with this rulemaking, and a 90-day comment period would enable them to do so. We understand that the Department of Ecology is also weighing important considerations with regard to the Climate Commitment Act. To the extent that the proposed rule may change from the draft framework, a 90-day comment period would enable the public and our members and supporters to understand any changes that may occur in the proposed GAP rule and respond accordingly. While we understand that the Governor's Office has directed the Department of Ecology to complete the rulemaking by the end of the year, informed public participation is necessary to help achieve the most health protective and environmentally responsible rule. Accordingly, we request that the Department of Ecology provides the public with a 90-day public comment period when publishes the proposed GAP rule.

Thank you again for the opportunity to participate in this critical rulemaking. We look forward to participating its final stage.

Sincerely,

Jaimini Parekh, Senior Associate Attorney

Amanda Goodin, Staff Attorney

Jan E. Hasselman, Staff Attorney

Earthjustice

LeeAnne Beres  
Executive Director  
Earth Ministry/Washington Interfaith Power & Light

Max Savishinsky  
Executive Director  
Washington Physicians for Social Responsibility

Stephanie Hillman  
Sr. Campaign Representative  
Sierra Club

Anna Doty  
Fossil Fuel Campaign Manager  
Washington Environmental Council/Washington Conservation Voters

Lovel Pratt  
Marine Protection and Policy Director  
Friends of the San Juans



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Page 2

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