

Larkin Omenn

Dear Rulemaking Lead Fran Sant,

This rulemaking is a chance to correct systemic harms that have gone unchecked and unanalyzed for far too long. Industry and regulators have ignored that health and climate impacts are directly connected. Evidence of communities being targeted and/or systemically harmed by heavy industry is clear in our local health disparities maps, the disproportionate impact of COVID-19 on communities near polluting industries and distribution lines, and the proximity of current and past toxic industries to Indigenous communities and communities of color.

The new rules must:

- *Acknowledge and uphold Treaty rights. Engage in meaningful consultation, and fulfill the trust responsibility to protect and preserve the natural ecosystems and resources.

- *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.

- *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.

At a time when WA and the world must dramatically reduce emissions as quickly as possible, any proposal to construct a massive new source of greenhouse gas emissions is irresponsible.

The new rules must also:

- *Require a climate test based on the best available science to assess a project's impacts.

- *Require assessment methods of a project's full lifecycle carbon footprint.

- *Include strong, enforceable mitigation requirements grounded in equity and with an aim of reducing emissions.

- *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.

- *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 take a stand for justice, healthy communities, and a liveable planet!