



July 13, 2020

Dear Ms. Butorac:

I am writing this letter because of an interest in the Department of Ecology's Greenhouse Gas Assessment for Projects (GAP) rule-making process and the need for special consideration of the role of energy intensive trade-exposed industries (EITEs) in reducing global emissions.

As both a state representative and a professor of environmental economics at Western Washington University, I am confident we can encourage economic growth and address climate change through the development of cost-effective emission reduction policies that are transparent and predictable. I appreciate the need for clarity and certainty in the permitting process and understand that those priorities prompted the development of the GAP rule.

It is essential that any rule-making regarding greenhouse gas emissions take into consideration the unique nature of EITEs in Washington State. I appreciate that you are in regular contact with a coordinated group of EITEs, and I want to communicate my support for considering their priorities in the GAP rule-making process.

Recently those EITEs submitted the following language to you for consideration in the rule-making process:

The rule must require the Washington Department of Ecology (WDOE) to include as part of its greenhouse gas impact evaluation, the overall impact of global greenhouse gas emissions outside the borders of the state (leakage). In addition, to encourage responsible growth, the WDOE must evaluate mitigation of greenhouse gas emissions on a greenhouse gas intensity basis. And finally, installation of best available control technology must be considered as an acceptable greenhouse gas mitigation measure.

I want to convey my support for consideration of the factors provided to you by that group of Washington State EITEs and encourage you to incorporate those provisions into the ultimate GAP rule.

One of the best things we can do for the environment is maintain a strong manufacturing presence in Washington state. Leakage of those emissions and jobs to other states and other nations will only result in the manufacturing of the same products without the important environmental and labor protections that exist in our State. This would result in an overall increase of global greenhouse gas emissions.

Thank you for your time and consideration.

Sincerely,

Sharon Shewmake
State Representative
42nd Legislative District, Position 2