



October 7th, 2025

VIA EMAIL TO: Isabel.Hanify@ecy.wa.gov

Isabel Hanify
Cap-and-Invest EITE Policy Planner
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Dear Isabel,

This letter is submitted by Front and Centered, a diverse coalition of community-based organizations across Washington State working to advance climate and environmental justice.

Thank you for the opportunity to comment on the Department of Ecology's draft report to the legislature on EITE allocation for 2035-2050. We would like to submit our 2022 report, "Exposing False Solutions: How Washington's Cap and Trade Program Gives Industrial Polluters a Free Pass," for your consideration. The report discusses the inherent limitations of carbon trading policies by prioritizing incremental change rather than structural change in EITE industries. It also explores potential environmental justice and climate impacts of EITE policies.

Our main findings suggest that without direct emission reduction standards, climate and environmental justice impacts will continue to burden frontline communities near EITE facilities. No-cost allowances prolong exposure to environmental hazards by not accounting for toxic greenhouse gas co-pollutants. Further, if in-state demand for polluting products declines, industries can export. Our report demonstrates that statewide exports of EITE industries have increased, leading to an increase in both carbon dioxide emissions and co-pollutants in communities near EITE-designated facilities, a trend that the EITE policy could continue without additional direct emission reduction standards.

Please review the enclosed report for a full analysis of the impacts of the EITE policy on frontline communities and on the state's greenhouse gas emission reduction goals.

Sincerely,

Maiko Patschke
Environmental Justice Analyst, Front and Centered

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