
To: ECY RE CCA Linkage
Subject: RE: Cap-and-Invest - Tribal Feedback

From: Sydney Cook
Sent: Monday, January 13, 2025 2:43 PM
To: ECY RE CCA Linkage
Cc: Heather Spore
Subject: Cap-and-Invest - Tribal Feedback

External Email

Dear Washington State Department of Ecology,

I am writing on behalf of the Swinomish Indian Tribal Community (Swinomish Tribe) to reiterate and support the Environmental Justice Council's letter regarding the Cap-and-Invest linkage rules. The Swinomish Tribe has previously submitted comments highlighting the importance of equitable tribal access to carbon markets, and we strongly echo the concerns raised by the Council regarding environmental justice and equitable implementation of these markets.

The Environmental Justice Council's letter emphasizes the risk of linked carbon markets disproportionately impacting vulnerable communities without proper safeguards. Specifically, they highlight the need to ensure that marginalized groups, including Tribal nations, are not left out of opportunities to benefit from emissions trading systems. They also stress that these markets must prioritize environmental and economic justice by directing revenue toward communities most affected by climate change and pollution, many of which are Tribal communities.

Aligned with these concerns, the Swinomish Tribe reiterates our position that:

1. Tribal access to carbon markets must be prioritized. The final rules should include specific pathways for Tribes to participate, such as funding mechanisms to support the development of carbon offset projects on Tribal lands.
2. Revenue structures must support Tribal sovereignty. Revenue generated should be allocated in ways that promote sustainable economic development and uphold Tribal self-determination.
3. Equity and environmental justice must guide implementation. Rules must explicitly prevent carbon markets from exacerbating existing inequalities or leaving vulnerable communities behind.

We strongly urge Ecology to incorporate these principles into the final rules to ensure the Cap-and-Invest program fulfills its potential to deliver equitable and sustainable outcomes for all.

The Swinomish Tribe appreciates the Council's leadership in advocating for these essential measures and reiterates our commitment to collaborating with Ecology to ensure equitable access and outcomes for Washington's Tribal nations.

Thank you for your attention to this matter. Please let us know if there are further opportunities for engagement or discussion.

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