

# Hoh Indian Tribe

Please either fill out this survey or upload your comments using the button below.

What do you think of the California-Québec agreement? Which parts do you support? Which parts concern you?

I am providing comments on behalf of the Hoh Indian Tribe's Natural Resources Department ("The Department"). The Department is concerned that linking Washington's market with that of California and Quebec will negatively impact overburdened communities and vulnerable populations, including the Hoh Indian Tribe. We are not certain that linking will result in overall economic and health benefits to Tribal communities, many of whom are dealing with the brunt of climate change. It remains uncertain that reductions in allowance price won't produce increased greenhouse gas emissions from unused allowances, or a decline in funding currently direct to Tribes through the CCA.

What's missing in the California-Québec agreement that should be included in an agreement with Washington?

To ensure that linkage will not negatively impact overburdened communities and vulnerable populations, including the Hoh Indian Tribe, the Department asks that the precautionary protections recommended by the Environmental Justice Letter to Ecology be implemented, including: 1) facility specific caps; 2) prohibiting the uses of unused allowances issued prior to WA linking to CA and Quebec; 3) limiting the use of offsets; 4) establishment of expiry dates for stored allowances.

How should we address environmental justice concerns in an agreement? Do you have recommendations for how the agreement can address concerns related to impacts on communities that have experience the greatest environmental and health burdens? (referred to in Washington as 'overburdened communities')

To ensure that linkage will not negatively impact overburdened communities and vulnerable populations, including the Hoh Indian Tribe, the Department asks that the precautionary protections recommended by the Environmental Justice Letter to Ecology be implemented, including: 1) facility specific caps; 2) prohibiting the uses of unused allowances issued prior to WA linking to CA and Quebec; 3) limiting the use of offsets; 4) establishment of expiry dates for stored allowances. <br> <br>An environmental justice assessment must be completed prior to linkage. We request that Ecology work with the Environmental Justice Council and request input from Tribes while drafting the environmental justice assessment.

What should we consider in our analysis of the linkage criteria? See the [preliminary analysis](#) we shared last year.

Ecology should ensure that meeting criteria related to emission reductions, and vulnerable populations and overburdened communities are considered as equally or more important than criteria focused on providing a cost-effective means for covered entities. <br>  
<br>Although linkage may provide a more cost-effective means for covered entities, it should not be pursued if it would "adversely impact Washington's ability to achieve the emission reduction limits established in RCW 70A.45.020" or reduces the "distribution of benefits from the program to vulnerable populations and overburdened communities."