

Anonymous Anonymous

Public Comment on Washington's Cap-and-Invest Linkage Agreement

Dear Washington State Department of Ecology,

I am a resident of Seattle who is deeply committed to Washington's climate policies and their role in advancing environmental justice. I appreciate the opportunity to provide input on the proposed Cap-and-Invest Linkage Agreement with California and Québec. While I support the linkage agreement for its potential to create a more stable carbon market, I have concerns about its impact on environmental justice and overburdened communities in Washington.

Perspectives on the California-Québec Agreement

The California-Québec Cap-and-Trade system has shown that linking markets can improve market stability and lower compliance costs, which benefits both businesses and consumers. However, evidence from California's experience has also raised serious equity concerns. Several studies have shown that some communities, particularly those near industrial facilities, did not experience the same air quality improvements as other regions. Washington must learn from these outcomes and ensure that its linkage agreement does not result in similar disparities.

While I support Washington's participation in a larger carbon market, certain provisions must be strengthened to protect overburdened communities from localized pollution increases and disproportionate economic burdens.

What's Missing and Should Be Included in Washington's Agreement?

A linkage agreement with California and Québec should include stronger safeguards for frontline communities, particularly in the following areas:

1. **Stronger Air Quality Regulations** – The California-Québec agreement does not do enough to prevent localized pollution hotspots. Washington must require additional air quality monitoring and direct emissions reductions in communities already burdened by pollution.
2. **Guaranteed Investment in Overburdened Communities** – While Washington's program mandates that 35% of Cap-and-Invest revenues go toward overburdened communities, the current structure distributes some of these funds as grants to community-based organizations. There is no clear accountability mechanism to ensure that these funds are reinvested directly into the communities most impacted by pollution. The agreement should include stronger oversight, transparency, and tracking requirements to guarantee that funds support tangible, community-driven projects that improve air quality, create local jobs, and promote clean energy access.
3. **Prohibition on Certain Offsets** – Offsets can allow polluters to continue emitting in Washington while purchasing allowances elsewhere. Washington should limit or eliminate the use of offsets for industries operating near vulnerable communities.

Addressing Environmental Justice Concerns in the Agreement

To ensure that Washington's Cap-and-Invest linkage agreement does not perpetuate environmental injustices, I recommend the following actions:

- Overburdened communities must have a formal role in monitoring and guiding the program's implementation, ensuring that their concerns are actively addressed.
- As mentioned, the current grant-based funding structure lacks safeguards to ensure the 35% allocation benefits impacted communities directly. Washington should develop clear guidelines for how these funds are spent and require that grant recipients demonstrate measurable benefits to the communities they serve.

Considerations for the Linkage Criteria Analysis

As part of the Department's analysis of linkage criteria, consider the following:

- Ensure that linking markets does not result in higher energy costs for Washington residents, especially for those in low-income and marginalized communities.
- Ensure that the linkage agreement does not weaken Washington's ability to achieve its own ambitious climate targets and environmental justice commitments.

While I support the Cap-and-Invest Linkage Agreement, I want to see more research showing that Washington will take additional steps to ensure environmental justice is fully integrated into the policy framework. This means addressing localized pollution, investing directly in overburdened communities, and making sure the program does not disproportionately burden marginalized groups. I urge the Department of Ecology to adopt these recommendations to make Washington's linkage agreement both effective and equitable.

Thank you for considering my comment. I appreciate the opportunity to participate in this important process.

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