



September 5, 2025

Washington Department of Ecology
Attn: Camille Sultana, Senior Environmental Planner
P.O. Box 47600
Olympia, WA 98504-7600

Re: Cap-and-Invest Program Updates and Linkage Rulemaking

Environmental Defense Fund (EDF) appreciates the opportunity to comment on Ecology's ongoing rulemaking to strengthen Washington's Cap-and-Invest Program and prepare it for linkage with California and Québec. We commend Ecology for advancing this work with urgency, as Washington's program is a cornerstone of the state's ability to deliver on its statutory climate commitments and ensure cleaner, healthier air for Washington communities.

EDF strongly supports Ecology's pursuit of linkage. At its core, linkage is about improving market stability, unlocking greater climate ambition, and securing long-term environmental progress. By joining with California and Québec, Washington will be part of the largest carbon market in North America, creating a more resilient system that reduces price volatility and strengthens confidence in pollution limits. We are encouraged by Ecology's projected timeline, which anticipates adoption of a proposed rule in 2026, a linkage agreement by next year, and operational linkage in 2026–2027. Meeting this timeline will provide clarity and certainty to stakeholders while ensuring the program continues to deliver environmental benefits without interruption. Washington has set ambitious climate goals, and swift progress on linkage is essential to achieving them while building momentum for subnational leadership and cooperation on climate change.

We also support the program changes under consideration to facilitate linkage, particularly aligning compliance periods and updating purchase and holding limits. These are practical but critical adjustments that will allow Washington to successfully integrate with other jurisdictions while preserving the environmental integrity of the program. Making these changes now will ensure that the Cap-and-Invest program continues to provide durable, predictable reductions in climate pollution. EDF looks forward to reviewing Ecology's draft proposed rule when it is released and stands ready to support this process however possible. We are committed to helping ensure Washington's Cap-and-Invest program remains a strong driver of climate ambition and delivers cleaner air, healthier communities, and a safer climate future.

Thank you for your leadership in advancing this important rulemaking and for your commitment to protecting Washington's climate and communities.

Sincerely,

Caroline Jones
Senior Analyst, U.S. Climate
Environmental Defense Fund

