Climate Pollution Reduction Program

2025 – 2027 Program Plan

Contents

Message from the Program Manager

Placeholder

Introduction

This program plan outlines the actions that the Climate Pollution Reduction Program commits to implement in the 2025-2027 biennium. The program plan is developed by the Climate Pollution Reduction Program Leadership Team with input from employees in the program. It is an internal plan used to prioritize work occurring in the program.

The actions outlined in this program plan help the program advance its mission, vision, values, as well as the goals, objectives, and strategies outlined in the agency 2025-2030 strategic plan. In addition, the actions are also informed by multiple other sources, such as:

- Priorities outlined by the Governor and in the state law and budget.
- Ecology's 2025-2030 Strategic Plan[1]
- Washington's environmental justice law, the Healthy Environment for All Act.

While this program plan does not reflect all the important work that is occurring in the program, it is meant to help identify actions that meet one or more of the following criteria:

1. Requires new resources or sizeable redistribution of existing resources.
2. Significant policy impact (e.g. implementing new legislation, risk to the agency, external party interest).
3. Requires cross-section coordination.

We anticipate that the program plan may need to be updated every other year to reflect changes in priorities or new priorities.

This program plan is organized based on the sections and units in the program's organizational chart. Some actions will be led by more than one section in the program; these actions are listed under the heading for the primary section but may be reflected in the supporting sections' work.

The program plan is important because it provides an opportunity for employees in the program to provide innovative ideas, provide input on decisions affecting their work and share priorities they'd like to see the program focus on. In addition, the program plan process provides the forum for the Climate Pollution Reduction Program Leadership Team to decide on program priorities and track the program's progress in implementing actions.

[1] apps.ecology.wa.gov/publications/documents/2401004.pdf

Program Plan Process and Timeline

The anticipated timeline for developing the 2025-2027 program plan is described in Table 1 below.

Table 1: Anticipated Timeline and Process for Developing Program Plan

Month/Year	Activity
May 2025	CPRPLT approves the process for developing the program plan.
August-September 2025	Program planner meets with section managers and unit supervisors to develop 2025-2027 proposed actions.
October 6-October 22, 2025	CPRPLT reviews and edits draft program plan.
October 27-November 7, 2025	Hold program comment period on draft program plan.
December 2025	Program planner works with CPRPLT to incorporate comments Final CPRPLT review and approval of program plan.

About the Climate Pollution Reduction Program

On August 16, 2023, the Climate Pollution Reduction Program (CPRP) was created, with approximately 45 employees, separating from the Air Quality Program. Since then, CPRP has grown to nearly 100 employees and accomplished significant climate work.

The mission of CPRP is to implement policies and programs to reduce carbon emissions in the state of Washington so that the state meets its statutory greenhouse gas emission limits.

CPRP focuses long term, requiring creative and strategic decision making for implementation to achieve broad statewide and interstate success reducing carbon emissions in the state of Washington so residents have a healthy environment and climate.

Our talented staff are responsible for the Cap-and-Invest Program, the Clean Fuel Standard, the Fluorinated Gas Reduction Program, the Greenhouse Gas Emissions Inventory, the Comprehensive Climate Action Plan, the Clean Vehicles Program, and others. We collaborate closely within the program, throughout the agency, and across state government to make sure we are reducing greenhouse gas emissions in an efficient, coordinated, and cost-effective manner.

We are national and international leaders in greenhouse gas reduction policy and actively work to share knowledge and support the implementation of climate policies in other jurisdictions.

Below is a summary of the eight overarching goals for the program in the 2025-2027 biennium and a summary of key activities we undertake to further our mission and vision. The key activities include work highlights that require new resources or sizeable redistribution of existing resources; represent a significant policy impact (e.g. implementing new legislation, risk to the agency, external party interest; and/or requires cross-section coordination.

Goal 1: Support and engage our communities, customers, and employees.

Below is a summary of CPRP's key activities to support this goal in this biennium:

- As a new program, CPRP will continue to establish, improve, and streamline processes to increase staff capacity, which allows staff to pursue the rest of the program's goals.
- CPRP accomplishes this goal by implementing outreach and communication that is critical to policy implementation.
- CPRP will continue to establish means that allow information sharing across all sections within the program, so that the program's internal work is coordinated.
- The Program will work to make IT resources equitable across all parts of the program.
- All members of CPRP will be responsible for pursuing Environmental Justice in all projects and policies. This includes conducting Environmental Justice Assessments and maintaining compliance with the HEAL Act.

Goal 2: Implement Washington's Cap-and-Invest Program to achieve state emission limits and pursue linking with the joint California and Québec carbon market.

CPRP works to build a stable, predictable and effective carbon market that facilitates Washington's efforts to achieve its greenhouse gas emissions limits and achieve net zero emissions by 2050 through engagement in the creation, auction, and exchange of compliance instruments in WA, CA, QC and in other jurisdictions creating or administering carbon markets. Below is a summary of CPRP's key activities to support this goal in this biennium:

- Pursuing linkage of Washington's market with California and Québec, to be completed in 2026 or 2027. CPRP accomplishes this goal through regular coordination with California and Québec to complete the statutorily defined requirements for linkage and revise Cap-and-Invest program rules to allow critical alignment with the existing carbon market.
- CPRP will report to the legislature detailed analysis and options for allowance allocation to emissions-intensive, trade-exposed entities (EITEs), by December 2025. This will be one year earlier than the required December 2026 statutory due date, in order to advance legislative deliberation leading to the development of an EITE compliance pathway that meets the requirements of the Climate Commitment Act.

- CPRP will update the Cap-and-Invest program through multiple rulemakings to enhance program effectiveness in the areas of emissions reporting, allowance market function, offset protocol development, offset market function, market linkage, and no-cost allowance allocation.
- CPRP will pursue the effective deployment of legislatively appropriated Tribal grant funding to enhance Tribal government participation through reduced administrative barriers, technical assistance, and improved coordination.

Goal 3: Implement the Clean Fuel Standard and continue to decrease the carbon intensity of Washington's transportation fuels and grow the alternative fuels market.

Below is a summary of CPRP's key activities to support this goal in this biennium:

- Ensuring data accuracy and completeness by implementing a third-party verification program, which requires program analyst and financial examiner staff resources.
- Communicating with regulated entities to ensure they are aware of their compliance obligations, and develop compliance and enforcement procedures aligned with CPRP's Compliance Assurance Manual.
- The Program will update Chapters 173-423 WAC and 173-455-150 WAC, as necessary, to ensure the Clean Fuel Standard Program is functioning as intended and in alignment with legislative priorities.
- Annual publication of a legislative report, which includes independent consultant analysis that estimates Clean Fuel Standard impacts on the retail cost of gasoline and diesel.
- Developing longer-range insights about the Clean Fuel Standard market, including through analysis and forecasts of credit markets.
- Supporting the work of the Inventory Unit in identifying transportation emissions data opportunities, and that of Ecology colleagues leading SEPA and PEIS reviews.
- Partnering with CPR IT to work with the California Air Resources Board (CARB) on a new version of the CFS application that will support multiple jurisdictions.

Goal 4. Continue to implement the state's transition away from the use of restricted hydrofluorocarbons and other fluorinated gases, which are potent greenhouse gases.

CPRP works to reduce fluorinated gas emissions for both currently operating large refrigeration and air conditioning equipment, and ensuring new products sold in Washington are using more climate friendly refrigerants. Below is a summary of CPRP's key activities to support this goal in this biennium:

- Updating and implementing Chapter 173-443 WAC to maintain an enforceable program and align with other regulations where possible.
- Ensuring new products entering into the Washington sales market are using climate-friendly substitutes and refrigerants. Products range from foam blowing agents to food dispensing equipment and air conditioners/dehumidifiers.
- Identifying and providing technical assistance to entities required to register in our Refrigerant Management Program.
- Conducting outreach and engagement to enhance the public's knowledge of and visibility for the wide range of entities required to comply with state hydrofluorocarbon (HFC) laws.

Goal 5. Reduce transportation emissions through the Clean Vehicles Program and conduct outreach, develop policy, and further implement the state Transportation Electrification Strategy.

Below is a summary of CPRP's key activities to support this goal in this biennium:

- Building out team capacity for data analysis and reporting implementation, and developing IT resources in support of fleet reporting
- Exploring alternative policy options that complement Washington's vehicle emissions regulations through outreach and engagement, such as through the ZEVergreen Initiative
- Supporting coordination of transportation electrification efforts with Clean Fuel Standard and Air Quality Program grants teams within Ecology, and across agencies through the EV Council
- Adapting program implementation to a dynamic federal policy landscape by developing approaches such as the update to regulatory guidance for the Advanced Clean Cars ll, Advanced Clean Trucks, and Heavy-Duty Low NOx Omnibus rules
- Communicating with the California Air Resources Board and updating Chapter 173-423 WAC to maintain alignment with California's Vehicle Emission Standards, as required by statute.

Goal 6. Improve Washington's greenhouse gas emissions inventory and develop additional greenhouse gas emission reduction policies, programs, and technical assistance.

Below is a summary of CPRP's key activities to support this goal in this biennium:

- Designing and implementing inventory methods that use data streams managed within the state and CPRP to support climate policy assessment and planning. This requires coordinating across sections to identify potential data streams and incorporate them into the greenhouse gas emissions inventory process as practicable.

- Expanding the state's natural and working lands inventory to better track changes in biogenic carbon stocks.
- Improving quality assurance and quality control processes across CPRP.
- Providing technical assistance to enhance policies that reduce greenhouse gas emissions from fluorinated gases and other short-lived climate pollutants.

Goal 7. Create a statewide strategy to meet Washington's climate goals.

Below is a summary of CPRP's key activities to support this goal in this biennium:

- Developing a durable comprehensive climate action plan that covers all economic sectors, through collaboration with Department of Commerce, impacted communities, Tribes, businesses, workers, subject matter experts, and more.
- Developing a plan for this work to be ongoing and funded by the state rather than one-time and project grant funding.

Goal 8. Support and learn from other jurisdictions with emerging or mature environmental markets.

Below is a summary of CPRP's key activities to support this goal in this biennium:

- Continuing and enhancing engagement with other jurisdictions with developed or emerging markets to learn from their experiences, aligning policies where necessary, and supporting implementation of their cap-and-trade or cap-and-invest programs, motor vehicles emissions standards, clean fuels standards, and more.
- Continuing engagement with US Climate Alliance to coordinate with other jurisdictions through workgroups addressing Short Lived Climate Pollutants, building decarbonization, transportation, and more.
- Continuing engagement with "Section 177 States" that adopt California's motor vehicle emission standards to coordinate policies and share best practices.

2025-2027 Actions

In addition to the core work of the program described above, CPRP commits to implementing the actions listed below for the 2025-2027 biennium. The actions are listed by section and are not in priority order.

Administrative Team

1. In alignment with Ecology standards, the Administrative Team will continue to support the program transition to the modern work environment (MWE), in coordination with

the agency MWE coordinator, including updates to document processing, onboarding, hybrid meetings, technology changes, etc.

2. The Administrative Team will continue to make process improvements to vital tasks in the program, including: recruitment routing, onboarding, off-staffing, and purchasing procedures.
3. The Administrative Team will ensure staff are properly trained in SharePoint functions.
4. Staff in the Administrative Team will create the Level of Service document, to include guidelines for timelines and notices of requests, admin purview, and required input.
5. The Administrative Team will develop and assign CPRP records retention schedules and ensure staff are properly trained on records retention and management.

Program Manager and Deputy Program Manager

1. The Program Manager and Deputy Program Manager will continue to prioritize maintaining progress in reducing Washington’s GHG emissions in line with statutory requirements by providing vision and moral leadership and support to the sections of CPRP. Leadership and support may include, among other things, providing knowledge, guidance, coaching, resources, and review, as well as supporting cross-program collaboration.
2. The Program Manager and Deputy Program Manager will continue to recruit and retain qualified staff to carry out the mission of CPRP.

Communications Team

1. The Communications Team will collaborate across the program to advise, develop, and help implement best practices for communication, outreach, and engagement with various audiences, including vulnerable populations, Tribes, the public, regulated entities, Legislators, and the Environmental Justice Council.
2. The Communications team will continue to guide and improve the program’s public-facing deliverables and other communications.

Budget Section

1. At the start of the 25-27 biennium, the Budget Section will build staff plans in coordination with section managers and unit supervisors and will review and update the program plan or strategic plan as needed to ensure alignment.

2. The Budget Section will establish a standard operating procedures document for contracting and the internal budget process. This work will be informed by other agency processes and then aligned with CPRP internal process and procedures. In coordination with the Office of Equity and Environmental Justice, the Budget Section will integrate environmental justice into budget and expenditure processes where required.
3. The Budget Section will support creating fiscal notes and provide relevant guidance to staff and managers during legislative sessions.
4. The Budget Section will support and create opportunities for section managers and staff to learn more about how the state budget process works.
5. The Budget Section will produce legislative reports as required, including the CCA Funds Report required by Chapter 70A.65 RCW.

GHGIT Section

1. The GHGIT Section will continue to maintain the GHG Inventory by conducting the following activities:
    a. Publishing legislative reports
    b. Developing processes for the annual publication of Statewide Greenhouse Gas Inventory
    c. Developing improvements to the Statewide Greenhouse Gas Inventory methods and deliverables
    d. Providing technical assistance to state government
2. The Section will continue to implement the Clean Fuel Standard Program with the following activities:
    a. Conduct rulemaking to update the carbon intensity targets for 2028 and beyond
    b. Develop third party verification to better ensure data accuracy
    c. Process the fuel pathway application backlog
    d. Promote electric utility investments
    e. Build out compliance and enforcement procedures
    f. Add longer-range program policy analysis
3. Throughout the biennium, the GHGIT Section will continue to implement the Clean Vehicles Program by:
    a. Increasing outreach to regulated entities and other interested parties
    b. Collaborating with other states to advocate for durable vehicle emissions policies
    c. Responding to legislative requests for technical support, including policy analysis

   d. Providing program guidance that adapts to changing federal actions
   e. Maintaining alignment with California's motor vehicle emissions standards.
4. Knowing that Environmental Protection Agency funding for the state's Climate Pollution Reduction Planning Grant ends in 2027, the GHGIT Section will undertake the following activities:
   a. Develop a long-term plan for the Comprehensive Climate Action Plan and Washington Climate Partnership work in state government. These activities are currently funded entirely by the Climate Pollution Reduction Planning Grant.
   b. Promote the use of the Comprehensive Climate Action Plan for decision-making by the Legislature, Governor's office, and state government agencies for policymaking, program design and implementation, funding decisions, and other activities.

F-Gas Section

1. The F Gas Section will expand Refrigerant Management Program (RMP) registrations for medium- and large-sized facilities.
2. The Section will work to enhance compliance with both product sales prohibitions and the requirements of the Refrigerant Management Program.
3. The F Gas Section will continue to expand and enhance outreach to regulated entities and increase the number of multilingual-translated publications it offers.
4. With adequate funding, the Section will form and chair a task force to provide recommendations to the Legislature on opportunities and barriers to further reducing HFC emissions, as required by HB 1462 (2025).
5. The F Gas Section will improve Refrigeration and Air Conditioning Management Platform (RAMP) application and update guidance and Standard Operating Procedures.

Policy and Planning Section

1. The Policy and Planning Section will work with the Program Leadership Team and sections in the program to improve the efficiency of the rulemaking process through review and revisions in a manner that considers the unique needs of CPRP.
2. The Policy and Planning Section will work with the GHGIT Section to update Chapter 173-424 WAC, the Clean Fuels Program Rule, to reflect new and innovative technologies.
3. As required by statute, the Policy and Planning Section will work with the GHGIT Section to update Chapter 173-423, the Clean Vehicles Program, to maintain consistency with California vehicle emission standards.

4. The Section and the Cap-and-Invest Policy Section will update the greenhouse gas reporting and Climate Commitment Act rules in Chapters 173-441 WAC and Chapter 446 WAC, propose and adopt amendments to Chapters 173-446 and Chapter 441 WAC that address electricity markets, and assess rulemaking needs for the Second Compliance Period that meet the statutory deadlines.
5. As needed, the Policy and Planning Section will coordinate with the Budget Section to implement the Climate Commitment Act Funds Reporting rules.
6. The Policy and Planning Section will coordinate with the F Gas Section to amend Chapter 173-443 WAC, Hydrofluorocarbons and Other Greenhouse Gases, to be consistent with EPA where necessary and include legislative amendments.
7. Community outreach will continue to remain a priority for the Policy and Planning Section. Under the guidance of CPRP's first Environmental Justice Planner, the Section will improve outreach practices and ensure that Environmental Justice considerations are built into its processes as required under the HEAL Act.

Emissions Reporting and Verification Section

1. The Emissions Reporting and Verification (ERV) Section will continue to share emissions data with the Auctions & Market Section to support Cap-and-Invest Program compliance.
2. ERV will publish data annually in January to communicate the status of reported greenhouse gas emissions on data.wa.gov.
3. The Section will continue to build and test the CAID database in partnership with CPR IT. This database currently serves as the primary repository of key data and information from mandatory greenhouse gas emissions reporters.
4. In partnership with CPR IT, the ERV Section is working to develop WA's GHG Reporting Tool (WAGGRT) to provide Washington with a state-first GHG reporting system that eliminates our reliance on EPA's e-GGRT. The new application will enable timely and compliant reporting for 2025 greenhouse gas emissions by prioritizing webforms for the most frequently used methods (found in EPA's 40 CFR part 98 – Subpart C focusing on combustion) while using standardized reporting options for other methods used in EPA's rules (other subparts).

Auctions & Market Section

1. The Auctions and Market Section ensures that market participants have access to an understandable market, helping entities make clear business decisions that allow them to decarbonize their facilities. To this end, the Section will continue to provide direct outreach and education through emails, phone calls, and market notices to covered entities so that entities are aware of their compliance obligations under the cap-and-invest rule, the tradeoff between obtaining allowances and reducing emissions, and

have ample opportunities to meet them. If entities are not compliant, the section will carry out enforcement actions as defined in the rule and the program's compliance assurance manual.

2. To ensure the public is educated on the cap-and-invest program, the Auctions and Market Section will continue to work collaboratively with the Communications Section to provide superior customer service.
3. The Auctions and Market Section will collaborate with the GHG Emissions Reporting and Verification Section to gather emissions data as the basis for entities' compliance obligations under the cap-and-invest program. This will ensure that the program maintains its emissions reduction integrity and can meet statutory emissions reduction limits by 2050.
4. The Section will collaborate with partner jurisdictions of California and Québec to establish and improve market surveillance, consistent incentives across jurisdictions, and allowance trading and auction platforms so that linked and unlinked jurisdictions are able to implement their program requirements and so that programs can maintain their integrity throughout implementation.
5. The Section will maintain and expand dialogue with other subnational and international jurisdictions considering and implementing their own Cap-and-Invest programs in order to promote a global understanding of carbon markets through venues such as the International Carbon Action Partnership, Carbon Pricing in the Americas, World Bank forums, and direct bilateral and multilateral information exchanges.
6. Because confidentiality and market-sensitivity is critical to a functioning market and avoiding rule violations, the Auctions and Market Section will continue to promote best practices for managing confidential and market-sensitive information. For example, the Section staff will continue to provide the "Managing Confidentiality and Market Sensitivity" training and track the number of Ecology and other agency staff that take the training.
7. The Auctions and Market Section will deliver biannual auction revenue forecasts used by OFM for the Governor's Budget, analysis of the allowance market, and—in conjunction with the Cap-and-Invest Policy Section—lead economic modeling and statutory reports on the contribution of the Cap-and-Invest Program to achieving the State's greenhouse gas limits.

Cap-and-Invest Policy Section

1. In pursuit of linkage with other carbon markets, the Cap-and-Invest Policy Section in FY 2027 will complete a draft linkage agreement with California and Québec, complete a written linkage criteria analysis, and an Environmental Justice Assessment to support the Ecology Director's decision whether to link markets, as directed in statute.
2. By the end of FY 2027, the Section will, in conjunction with the Policy and Planning Section, Auctions and Market Section, and Reporting and Verification Section, complete

rule amendments to Chapter 173-441 WAC and Chapter 173-446 WAC to update the Cap-and-Invest Program and effectuate market linkage with the benefit of a robust public engagement process.

3. The Cap-and-Invest Policy Section in FY 2026 will revise the methodology for no-cost allocation to electric utilities for 2026 allocation and the methodology for no-cost allocation to electric utilities in the 2nd compliance period (2027-2030).
4. In December 2025, the Section will publish a report to the Legislature with analysis of methods for determining how many no-cost allowances should be provided to emissions-intensive, trade-exposed (EITE) facilities from 2035-2050.
5. The Cap-and-Invest Policy Section in FY 2026 will complete rulemakings to adopt changes to Cap-and-Invest protocols for establishing offset projects and generating offset credits for the development of Ozone Depleting Substances and US Forest projects.
6. The Section will significantly expand offset project registry operations in FY 2026, in response to a major increase in offset project development. The Policy section will review offset project submissions, provide technical assistance to project developers, and make offset credit issuance decisions.
7. The Cap-and-Invest Policy Section by June 2027 will develop and administer grant agreements and provide technical assistance to 28 Tribes to spend $21M in legislatively-appropriated Tribal Climate Capacity grant funds, and to 6 Tribes to spend $5M in legislatively-appropriated Tribal Carbon Offset Assistance Program grant funds.

IT Section

1. The IT Section will collaborate with other sections across the program to provide knowledge, guidance, coaching, and review in IT support and application development services. The IT Section will continue to prioritize application maintenance and new projects in line with statutory and program/section requirements as agreed to by program leadership.
2. The IT Section is engaged in supporting the program in meeting Ecology’s goals.
    - Goal 1:
        - Create and maintain a maintenance and project intake process to streamline interaction with our internal customers;
        - Produce project status reports to allow internal customers and others to track progress;
        - Create customer facing Web Applications that follow the WCAG 2.1 Level AA accessibility standards required by WaTech State Policy 188;
        - Boost our knowledge in User Experience and User Interface to increase application adoption;
        - Build a reusable design library to streamline development and promote consistency across apps;

    - Improve the Climate Portal for security and operability.
  - Goal 2:
    - Continue maintenance of the applications at the core of Cap & Invest including GHGReg, WEDGE and CAID;
    - Support continued reporting for the covered entities in face of Federal EPA changes
    - Create a new tool (WaGGRT) in support of pursuing linkage of Washington's carbon market with California and Québec;
    - Streamline reporting on the use of the market funds through the development and use of the FACTS system for CCA Funds Reporting.
  - Goal 3:
    - Continue maintenance and enhancements for WFRS, including a buy/sell board, Advance Credit reporting and introduction of third party verification;
    - Work with CARB on a new version of the CFS application for multiple jurisdictions.
  - Goal 4:
    - Continue the improvement of the RAMP application with changes to fee structures, compliance tracking and reporting; and maintain a mobile inspection application for use in the field;
    - Create and maintain an application for tracking and reporting on suppliers of equipment or gases, level of compliance and enforcement activities.
  - Goal 5:
    - Support the Clean Vehicles team with an application that allows businesses to report fleet makeup.
  - Goal 6:
    - Continue maintenance of the SAGE system as necessary;
    - Provide assistance where requested by the Inventory team.
  - Goal 7:
    - Continue to ensure data security, confidentiality, integrity and continuity between our core systems.
  - Goal 8:
    - Continue our interaction with CARB regarding both carbon market linkage and clean fuel reporting;
    - Work with other jurisdictions and the US Climate Alliance to strengthen greenhouse gas emission reporting.

Shared Program Responsibilities

- Each member of the Climate Pollution Reduction Program will prioritize cross-program collaboration to facilitate knowledge transfer and a shared understanding of the broad scope of the program’s work.
- All staff are responsible for ensuring that the program operates within its budgetary constraints.
- All staff are responsible for ensuring that all documents are accessible.
- Staff of the Climate Pollution Reduction Program shall ensure that Environmental Justice and Tribal sovereignty are considered in every project and policy rooted in our program. Staff must meet the requirements of the HEAL Act in every action.