



May 6, 2026

Stephanie Potts  
Cap-and-Invest Program Linkage Planner  
Department of Ecology  
State of Washington  
P.O. Box 47600  
Olympia, WA 98504-7600

*Re: Cap-and-Invest Comments on draft Washington-California-Québec linkage agreement, draft Linkage Criteria Findings, and draft Environmental Justice Assessment*

Dear Stephanie Potts:

Washington Conservation Action appreciates the opportunity to provide comments on the linkage documents that have been shared for public review. Washington Conservation Action (WCA), formerly Washington Environmental Council, has been a leading policy voice for the environment in our state for nearly 60 years. We develop, advocate, and defend policies that advance environmental progress and justice.

WCA supported passage of the Climate Commitment Act in 2021; defended the law from repeal in 2024; has engaged in its implementation through ongoing rulemakings and public processes; and has advocated in the legislature for numerous updates to strengthen the program. We are committed to helping build a state policy framework to achieve Washington's greenhouse gas emissions limits, and the cap-and-invest program in an important element of this framework.

Linking Washington's carbon market with California-Québec will likely have significant consequences for the cap-and-invest program's effectiveness, ongoing viability, and revenue generation. It may also have important implications for carbon markets on a national and international scale. Ecology's draft Linkage Criteria Findings and Environmental Justice Assessment consider many factors that will influence the outcomes of linkage. To do this, Ecology relied on the expertise of agency staff and contracted with independent parties, including the University of California, Western Washington University, and Monitoring Analytics.

These numerous efforts have led the agency to the conclusion that, in spite of

considerable uncertainty and inevitable tradeoffs regarding affordability, revenue generation, and near-term emission impacts, linking Washington with the California-Québec market will lead to the most stable program and deliver long-term emission reductions. This conclusion is consistent with the agency's position and efforts over the past five years since passage of the Climate Commitment Act, and the documents shared for public comment outline the Ecology's reasons for this conclusion. The draft linkage agreement is aligned with this determination and outlines a responsible approach to moving toward the identified goals.

At the same time, there are concerns raised in the draft documents that cannot be resolved at this time, such as whether projected short-term emissions increases after linkage will in fact be followed by longer-term emissions decreases attributable to the cap-and-invest program. The impacts of reduced program revenue, particularly for Tribal Nations and in overburdened communities, is also unknown. The draft documents make the case that the anticipated benefits of linkage, particularly lower compliance costs and the likelihood of a more predictable and politically durable program, make linkage worth the risks. However, as Ecology continues to pursue linkage, and likely enters a linked market in the near future, we urge the agency to continue assessing impacts to Tribal Nations and overburdened communities and whether linkage is serving the goal of reducing greenhouse gas emissions, both in Washington and globally. Alongside this assessment, we urge Ecology to continue pursuing the necessary tools and adapting the program to ensure it is in the strongest position to support an equitable and timely clean energy transition.

We respect and share Ecology's commitment to realizing just and effective outcomes from our state's environmental laws, including the Climate Commitment Act, and look forward to continued work to advance climate progress in Washington and beyond.

Sincerely,

Caitlin Krenn  
Climate & Clean Energy Director  
Washington Conservation Action