



PUBLIC WORKS
808 W. SPOKANE FALLS BLVD.
SPOKANE, WASHINGTON 99201

June 26, 2026

Marrisa Tousley
Department of Ecology
Cap and Invest Program
P.O. Box 47600
Olympia, WA 98504

Dear Ms. Tousley:

The City of Spokane ("City") appreciates the opportunity to provide input and comment on the Department of Ecology's (Ecology) development of policies related to carbon management as it applies to the Cap-and-Invest Program. As you are aware, the City's Waste-to-Energy Facility (WTE) is a unique covered entity. No other solid waste disposal facility in the state (e.g. landfills) is expected to comply with the decarbonization policies the agency will adopt. It is important that Ecology move quickly to develop these policies to help guide our investments in carbon capture as a compliance mechanism. Doing so will assist the City in its continued efforts to reduce the rate impacts our residents will be subjected to from the purchase of carbon allowances.

While we realize that carbon sequestration is the focus of your current policy development, we encourage the following considerations of multi-benefit alternatives and funding for carbon capture:

- There are multiple benefits in capturing and reusing carbon. For example, using captured carbon in food and beverage grade CO₂, Sustainable Aviation Fuel (SAF) and a variety of other products could replace those that are currently manufactured with virgin materials. In particular, Ecology's carbon management program should recognize that Washington is investing heavily in SAF and provide a compliance mechanism that credits facilities, like the WTE, that capture and reuse CO₂ for SAF. Credits for this reuse pathway could involve existing or future rules under Washington's Clean Fuel Standard.
- Added incentives should apply to mineralization projects. These projects provide multiple environmental benefits. For example, the use of CO₂ in cement manufacturing not only sequesters the CO₂ but also reduces the water necessary in the manufacturing process, protecting two natural resources. These integrated types of approaches that protect air, land and water should be part of the agency's thinking going forward.

- Because carbon capture technologies are still new in Washington State, we encourage Ecology to work within the agency and with the state Legislature to allocate Climate Commitment Act funds for pilot and demonstration project grants to vet carbon capture technologies for sequestration and alternate pathways (e.g. reuse). As you further develop a sequestration policy, entities face an aggressive timeline to put sequestration facilities in place for carbon capture systems.
- While biogenic greenhouse gas (GHG) emissions are not inventoried under the Climate Commitment Act, the sequestration of biogenic CO₂ should be accounted for when considering an entity's covered emissions. If a covered entity sequesters emissions that are comprised of both biogenic and anthropogenic carbon sources, the environmental benefit of removing the biogenic carbon from the atmosphere should be recognized. For every one metric tonne of CO₂ captured and sequestered, the covered entity should receive one metric tonne toward its compliance obligation regardless of the carbon source. This approach expedites the removal of carbon emissions from the environment.
- More broadly, the City encourages Ecology to credit efforts that reduce the climate impacts of agricultural and forest land burning. As controlled burns increase across our state for wildfire prevention and safety, there are opportunities to reduce the GHG emissions associated with these practices. One example is the use of pyrolysis in place of burning to create biochar and other byproducts. Biochar not only sequesters carbon for hundreds of years but can also be used as a soil amendment, water quality filtration medium among other applications. Crop stubble used to create packaging materials not only reduces agricultural burning but also displaces fossil fuel-based packaging.

Thank you again for the opportunity to provide comments on Ecology's development of a carbon sequestration policy as part of the agency's carbon management program. We encourage you to move forward as quickly as possible with this and other policies related to carbon management. Any delay in rule, policy and/or guidance for carbon capture, sequestration, and alternate pathways creates uncertainty. Not knowing the outcome of Ecology's rules, policies and/or guidance, creates a barrier to investing in carbon capture technologies that provide long-term solutions.

We look forward to continuing to engage as this policy moves forward. The City of Spokane is committed to protecting and improving our environment and working with Ecology for the health of our community, the state and beyond. Please do not hesitate to contact me should you have any questions or would like more information regarding any of our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Averyt". The signature is fluid and cursive, with the first name "Chris" and last name "Averyt" clearly distinguishable.

Chris Averyt
Director of Strategic Initiatives and Development
City of Spokane Public Works