

testimony 7/14/16

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Department of Ecology Public Hearing
WA Clean Air Rule
Olympia WA
July 14, 2016

Dept of Ecology

My name is Bruce Amundson. I'm a family physician, and President of Washington Physicians for Social Responsibility. I speak tonight on behalf of our 800 members statewide, who strongly support the development of the Clean Air Rule to limit the greenhouse gas emissions that contribute to climate change.

We advocate for the strongest possible version of this rule, to help prevent unmitigatable effects of climate change which will produce the worst health crisis of this century.

At its core, climate change is fundamentally about impacting human health. The connection between climate change and health is impossible to ignore. According to the Climate Impacts Group at UW, in the Puget Sound region alone, climate change is already affecting our health through both the direct effects of more intense heat waves and higher flood risk, and the indirect effects of increasing wildfire severity, declining summer water supply, shifting infectious disease dynamics, and declining air quality.

The American Academy of Pediatrics recently released a report confirming that climate change poses major threats to human health, and that children stand to be uniquely vulnerable to these threats, suffering from the physical and psychological sequelae of weather disasters, increased heat stress, greater frequency of asthma due to decreased air quality, and food, water, and nutritional insecurity in vulnerable communities.

Furthermore, the EPA has stated that the higher concentrations of ozone due to climate change may result in thousands of additional ozone-related illnesses and premature deaths per year by 2030 in the US, if no changes are made in our air quality policies.

To be effective in capping carbon emissions in Washington, it is essential that the Clean Air Rule is the strongest rule possible. Therefore, we support rule improvements, including:

- Ensuring that the rule prevents double counting - so that the rule is guaranteed to result in new, real reductions in emissions.
- Ensuring that the rule coordinates with the federal Clean Power Plan, so that covered entities adhere to the stricter guidelines of the Clean Air Rule.
- Setting aggressive emission reductions targets, which means an aggregate cap based on the best, current science.

If we are able to create a strong rule that is effective in its ability to regulate carbon emissions, we will be beginning to do our part as a state in mitigating the health effects of climate change. Time is not on our side. The health of residents and future generations demands a bold reduction in greenhouse gas emissions. Thank you for your work to create an effective Clean Air Rule.

Bruce Amundson, MD
President, Washington Physicians for Social Responsibility
4500 9th Ave. NE
Seattle, WA 98105

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PUBLIC COMMENT SHEET

NAME Christina Bali
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COMMENTS (Please use as many sheets as needed)

Hi! My name is Christina Bali. I'm here on behalf of the Asian Counseling + Referral Services (ACRS), The Asian Pacific Islander Commission (APIC), + Front + Centered.

I want you to look at the room around you. Is there anyone missing from this conversation? Maybe missing friends, family, + neighbors. For me, we are missing folks of color, low-income communities, + the homeless population.

- We are missing the voices of the clients we serve @ ACRS who experience disproportionate rates of depression, suicide, + other mental health issues who have been displaced due to extreme climate events.

- We are missing the voices of my friends + family in South Park, South Seattle, + South King County who suffer from increasing rates of asthma, upper respiratory diseases, + allergies.

- We are missing the voices of my family, especially my grandmother who suffered a heart stroke last year during the heat wave.

I would like to point out that these voices are voices of low-income, people of color, + the homeless. These voices have a unique + intimate relationship w/ the environment + are also left out of

the conversation + policy decisions due to the inability to find the time, money, + transportation down to Olympia. These populations are disproportionately affected by carbon emissions + climate change.

With that said, I'd like to ~~recom~~ recommend that the EJAC should expand the responsibility ~~to~~ of the committees beyond the use of reserve ERUS -

- I recommend that the EJAC should have the capability + responsibility to evaluate the impact of CAR on highly impacted communities + make recommendations to address persisting disparities.

I also recommend that committees should come from communities most impacted the air pollution.

- Their experiences / ties / stories are invaluable

- They can best effectively provide their own communities

with an active role in climate change.

- With these spots + voices @ the table, we can better effectively create, implement, + monitor CAR on highly impacted communities.

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Dept of Ecology

Speech for Ecology's Clean Air Rule hearings.

Good evening. My name is Bourtai Hargrove.

When I look at Ecology's proposed Clean Air Rule, I am dismayed by how feeble it is. In April, cumulative CO2 levels reached 407.42 parts per million, a level not seen on earth since the Miocene Epoch, 10 to 15 million years ago. And CO2 emissions continue to rise with frightening speed. We are on a trajectory to warm 4 to 6 degrees Celsius above pre-industrial levels by the end of the century. We may already have passed the point where we can hold global warming below 1.5 degrees C and are well on our way to 2 degrees C, the threshold beyond which looms civilization-threatening climate disruption. Climate scientists, like Jim Hansen, warn us that we have a narrow window of time to drastically reduce our use of fossil fuels and halt anthropogenic climate change before dangerous tipping points and feed-back loops take it beyond human control.

At a time when climate scientists are warning us that it is crucial to reduce carbon emissions by at least 8% per year, Ecology proposes a mere 1% reduction. A 1% reduction will do little or nothing to stave off catastrophe. We are in a planetary emergency. Gradualism is no longer possible, compromise is no longer possible. We must forget political considerations. The very least that Ecology can do in its final rule, is set a science-based goal of 8% carbon emission reductions. We have no choice. We must reduce our carbon emissions by 8% per cent a year, or we will condemn our children and grandchildren to a hellish world of unprecedented storms, heat waves, water shortages, crop failures, resource wars, climate refugees and a loosening of the bonds that hold civilization together.

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My name is Abby Brockway I am a member of Delta 5. We are still in litigation with Washington State to set legal precedence. Tonight I am also a member of Faith Action Network and Earth Ministry and in support of the work of the eight kids and their parents who set their own legal precedence.

I am requesting that you use best science for the Clean Air Rule. As currently written the reduction of 1.7% does not mitigate the harms but instead sets us on a destructive path as we are already seeing.

Today science requires 8% carbon reduction needed not 1.7%.

Governor Inslee says this current clean air rule is, " a good first step". This is delusional and he knows it he is in a box as most politicians are. We should have started this reduction in 2015 when we could have used the 6% number but again today we need 8%. If we wait to implement until 2020 then science will require an 18% reduction and I believe that is not do-able for those industries in Washington State to survive and for our children's future. I understand that Ecology has been under fire from industry. Industry does not like to change. They do not see it profitable to change.

I am a painting contractor in Washington State and own a small company. Ecology implemented a lead abatement plan called Renovation Repair and Painting Program known as RRP. This program caused our entire industry to change all practices, required us to get certified and licensed, required us to buy new certified HEPA vacs. and tools along with other costly equipment, required us to do much more paperwork... yet, we still have a vibrant industry The regulations were done for the health and safety of people and especially our children.

This same vigor needs to be done here. For our children. And that is why we must pay for our discomfort now. We already see the earth raging against us as she protects herself from the unhealthy imbalance of carbon in our atmosphere. She has a fever. As a mother, I cry at this connection. I have nursed my sick daughter back to health many times and that primal need to protect my daughter and her future is real. I want her to be able to live the life a young person should live. I am heartbroken that her generation has such a grim future. In this heartbreak I am doing every possible thing I can think of to inspire change and I surround myself with those that are doing the same. That is why I have not eaten since Monday night. I want to harness the power that our faith community, our parents and grand parents to show the moral side of this struggle. We have a big space in this arena and we are taking it. Not with money and GDP but with Fierce love.

As Eleanor Roosevelt once said "You gain strength, courage and confidence by every experience in which you really stop to look fear in the face. You are able to say to yourself, 'I have lived through this horror. I can take the next thing that comes along.' You must do the thing you think you cannot do."

Please : Do the thing you think you cannot do: implement 8% reduction NOW.

~Abby Brockway 206.484.9857 herpaint@gmail.com

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Dept of Ecology

NAME Terence Carroll

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COMMENTS (Please use as many sheets as needed)

Due to the inability of our federal government to address climate change, the greatest environmental danger that the world faces, we have a moral imperative to act as quickly as possible and do as much as we can ~~at the state level~~ ^{at the state level}.
The clean air rule proposal is not perfect, but we absolutely need to take this first step, which can then hopefully be strengthened... A carbon tax or strongly controlled cap and trade program ~~is~~ will be a necessity.
for

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Dept of Ecology

NAME

Chris Carson

ADDRESS

718 N. Eastside St

EMAIL

Olympia, WA 98506

COMMENTS (Please use as many sheets as needed)

As our custodians for the health & well being of the citizens of Washington State now & into the future you must enforce the ppm reduction using best climate science, 2% per year is not enough. This is of the utmost importance to bring us climate stability as we face without it a terrifying future that will be devastating for all you are sworn to protect, so do it now! A full 8% per year is the reality of what is needed. This is a life & death emergency, business as usual will only send us over a climate cliff from which we can not return. Do not settle for the washdown diluted compromises. Be strong, be bold. The future will thank you. The present will breathe a little easier & you will know that you are part of it.

I come from Cleveland, Ohio but have lived here in Washington State for many decades. I grew up on the shores of Lake Erie that at that time was declared a dead lake. I witnessed the affects of burning river, the Cuyahoga so many destructive toxins had been put in it that bridges going to fall top on the delta islands collapsed. I saw fish whose eyes were eaten out by the chemicals, even though they were still alive. To my horror I saw an old black man catch one & when I asked what are you going to do with that

he said, "I'm going to take it home & cook it. That's good eating!" My father was the county building inspector & architect there were many places aluminum window frames could not be used because the "atmosphere" would destabilize them causing huge glass panes to come crashing out. Tombstones were being eaten away. I share all of this with you as Cleveland is evidence that some of these severe problems can be rectified or at least improved if proper regulations are introduced. The river no longer catches on fire, the lake produces oxygen again, bridges aren't collapsing from the chemicals, boy scout groups doing river clean up aren't getting severe chemical burns, so many things have improved though much is still needed - but the lesson here is that bold changes can work. But only if you do it. Your time is now. We encourage you & entrust you to enforce the 8% reduction that is imperative & yes we will have your back. We are watching. We are awake. We empower you to stare down the money interests & put the climate & the well being of all as a priority.

7/14/16

July 14, 2016, Cheri Cornell, CoolMom comments before the Department of Ecology on Clean Air Rule

- Thank you for your time and leadership.
- My name is Cheri Cornell and I am the Executive Director of CoolMom.org, where we see climate action as a moral imperative.
- You may ask, **Why a Mom-led Climate Group?**
- It's because there's nothing like motherhood to make global warming move from the esoteric to the painfully real.
- We are not simply worried about some future generation; we are worried about what we are doing to our children **now**.
- So get ready, I'm going to go mom all over you.
- I want to talk to you about **Intergenerational Equity**.
- This concept means that **humans hold the natural environment of the Earth in common BOTH with other members of the present generation AND with other generations, past and future.**
- The very existence of the Department of Ecology is based on the idea of intergenerational equity—you hold the natural environment in trust for me, for my children, and for my grandchildren.
- You are here to make sure that we listen to the better angels of our nature! You are not here to merely split the difference between our lesser and better angels when it comes to our CLIMATE.
- Those who insist on going slowly on reducing carbon emissions are engaged in **Wholesale Generational Theft!** My Department of Ecology should not be complicit in this crime.
- So here's what a mom is going to say to Ecology and the Greenest Governor in the country about Climate Change and the draft Clean Air Rule: that's a decent start, kids, but I know you can and will do much better. A 1% annual reduction in carbon emissions is not enough. I expect you to reduce annual carbon emissions based on the best available science, much closer to 8%.
- Also, I want you to eliminate double-counting loopholes. Let's not legitimize cheating.
- I'm not done yet, Ecology. You are trustees of the natural environment for all generations; and to reach beyond the Clean Air Rule to bring us more tools to fight climate change.
- And, please, Department of Ecology, don't make me or any other mother come back down here and talk to you about this again.
- Make us proud.

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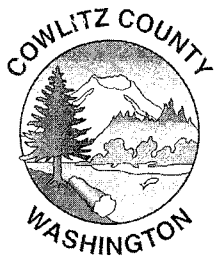
JUL 14 2016

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NAME Phil Cornell
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COMMENTS (Please use as many sheets as needed)

Clean air is everyone's right. It must be protected.



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Statements to be presented at Public Hearing in Olympia July 14, 2016

Statements addressed to:
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

**SUBJECT: Proposed Rulemaking to Adopt a New Rule (Chapter 173-442 WAC)
and Revise Chapter 173-441 WAC**

My name is Don Olson, an employee of Cowlitz County. These statements are being made on behalf of Cowlitz County, who is the owner and operator of a regional municipal solid waste landfill, called the Cowlitz County Headquarters Landfill. These statements will be brief, and echo the most important substance of written comments that are being filed separately by the Cowlitz County Board of Commissioners, as well as the Cowlitz County Dept. of Public Works.

Cowlitz County understands the intent of the clean air regulation being proposed by Ecology as a movement towards world-wide stewardship of our planet's biosphere in a responsible manner. That is a normal and reasonable concern for human beings, and it is an appropriate realm for governmental rulemaking. We have concerns, however, that the zealous attempt to enact what appears to be a workable emissions cap-and-trade regulation is being over-reached in the State of Washington by the inclusion of landfills, which we strongly believe are inappropriate for this type of rule.

We are concerned that Landfills Do Not Fit the Intent of the Proposed Rule.

As described by the EPA:

“Landfills are different than many other traditionally regulated emissions source categories. Typically, entities regulated for air emissions are involved in manufacturing or production and their emissions are directly related to processes involved in creating products (e.g., vehicles, bricks) or commodities (e.g., natural gas, oil). When manufacturing or production facilities cease to operate, their emissions typically cease. Landfills are a service industry—a repository for waste that needs to be properly disposed—and their emissions are a by-product of the deposition of that waste.”

The proposed rule expects facilities to reduce emissions over time, while in fact landfills will have increasing emission rates during their operating life. Thus, the only way that they could attempt to

comply with the proposed rule would be to buy their way out of it by paying a penalty in the form of Emission Reduction Units.

We are concerned about the unintended consequences of force-fitting landfills into this type of regulation.

Our cost estimate of ERU penalties to the County in the timeframe from 2017 to 2035 is over \$80 million, and continues at an increasing amount after that.

In the economic analysis performed by Ecology for this proposed rule, Ecology believes that the additional costs for a facility to comply with the rule would be as simple as passing the costs on to its existing customers. Unfortunately this simple logic does not apply to the waste-management sector, because waste is a commodity that easily, and commonly, flows across state borders.

Given the complexities of pricing landfill airspace, we have significant concern that the cost increases required to be compliant with the proposed emissions rules would have a very real unintended consequence of pushing our landfill customers across State borders. Thus the economics of our County landfill would be imperiled, and the intent of the GHG initiative with respect to landfills would not only be essentially defeated, but worsened by the extra transportation of waste out of State.

We Have Suggested Alternatives for the Control of GHG Emissions from Landfills.

Landfills have been a significant “positive” to the social stewardship of the environment, and are way ahead of any other industrial sector with regard to historical control of their GHG emissions. Their success is attributed largely to prescriptive-based regulations imposed at the Federal and State levels to protect groundwater and air resources.

We are supportive of State-incentivized waste diversion requirements for reuse and recycling. We are partnered through a franchise with our local private waste collection company that implements these types of programs.

The efforts of following best-management operational practices prescribed for landfill gas collection and treatment, combined with State-incentivized waste diversion, are appropriate means of approaching long-term GHG emission controls for waste facilities, as demonstrated by the track record of past efforts. We are very concerned that including landfills in a cap-and-trade type of emissions program will be non-productive and disruptive not only in the goal towards reducing GHG emissions, but on the whole front of promoting proper management of waste residuals in the State of Washington.

Very truly yours,

COWLITZ COUNTY

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Dept of Ecology

NAME Lisa Crowley

ADDRESS 846 45th Ave SE Olympia WA 98501

EMAIL crowley1@hstawi.com

COMMENTS (Please use as many sheets as needed)

The clean air rule proposed is a good start, and I'd like to show my appreciation to your effort. I do like to ask that you consider setting the target @ 8% of emissions reduction.

The committee should have the capacity and responsibility to evaluate the impact of the rule on highly impacted communities and make recommendations to address persistent disparities in air quality.

We all have to breathe air, & we all know what we live here, is the beautiful Washington state. Please listen to your heart, do what is right, and use this opportunity to get it right.

Thank you ;

Sincerely,

Lisa Crowley

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Dept of Ecology

NAME Peggi Erickson

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COMMENTS (Please use as many sheets as needed)

Please do not tell us that there are "legal realities" that force us to compromise the future lives of our children and their children. We must decrease fossil fuel emissions 79% per year according to science. We must do much better than the current Clean Air Act proposes. Please revise it to comply with the court mandated limits of 79%/year. If Washington mobilizes, like the country did for WW2, we can meet the more aggressive number.

We cannot afford to do so little to reduce emissions.

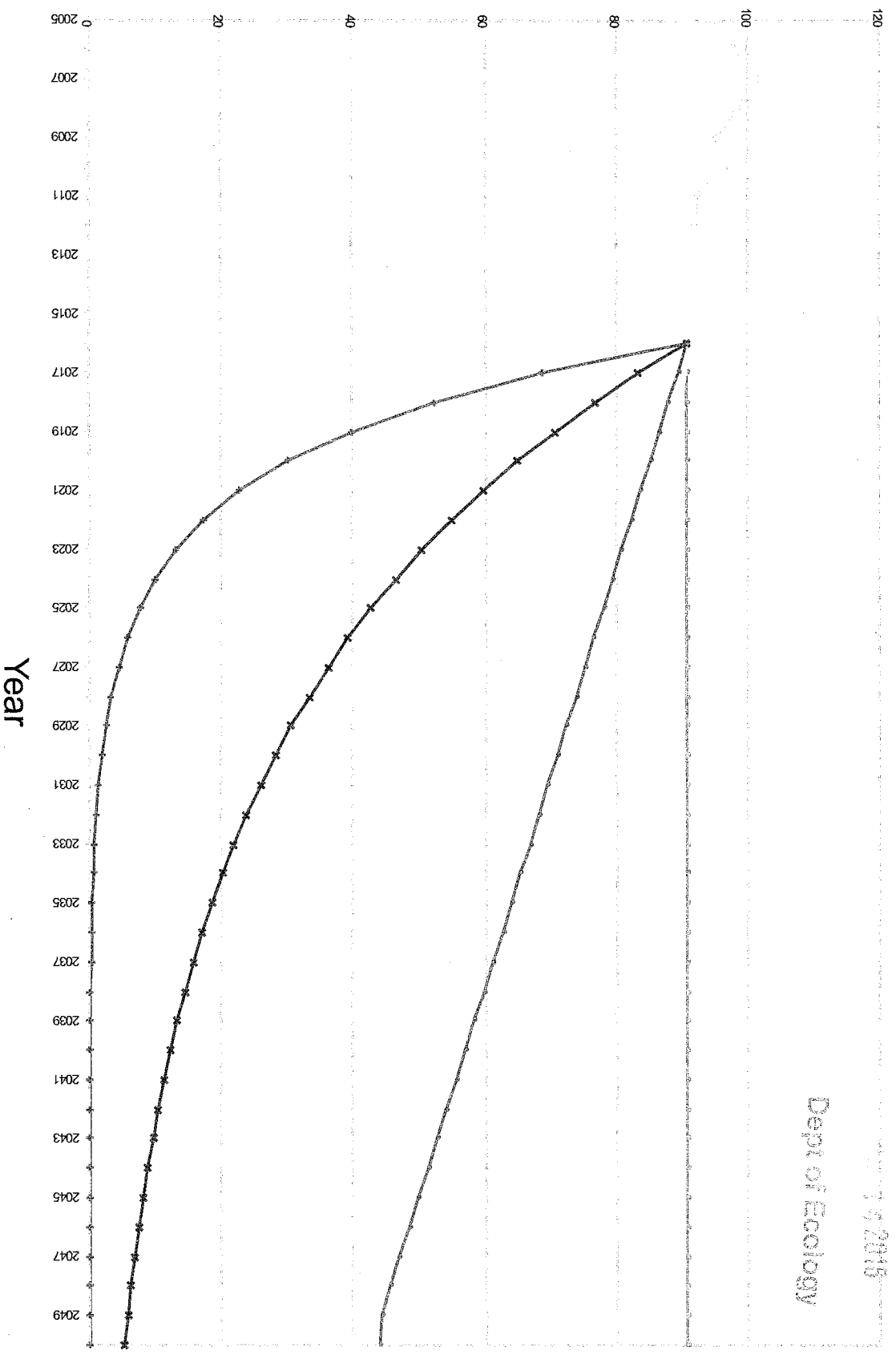
Washington GHG Emissions

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1/9/2015

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GHG Emissions (Metric Ton CO2e)



Historic Emissions - Department of Ecology

Historic Emissions - Our Children's Trust

Yearly GHG Emissions - Adopted 50% by 2050 target

Yearly GHG Emissions - Per Capita Distribution for 350 Goal

Yearly GHG Emissions - Proposed Clean Air Rule

Yearly GHG Emissions - World Average Reductions for 350 Goal

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July 17, 2016

Dear Governor Inslee,

My name is Jared Howe and I am one of the parents undergoing a fast in the three days leading up to the public meeting on the Department of Ecology's public meeting on their revised Clean Air Rule.

As you know, the re-drafted Rule specifies carbon emission reductions of 1.7% per year. That is insufficient. Current science indicates that reductions of 8% per year are needed to ensure a livable planet for our children.

In addition, the Rule only covers two-thirds of the state's carbon emissions. This is insufficient to achieve the reductions needed to protect current and future generations.

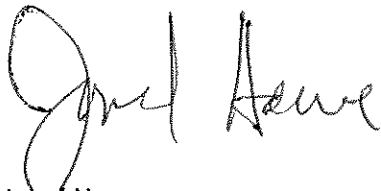
In short, the revised Clean Air Rule utterly fails to protect our children from the ravages of catastrophic climate change that are certain to happen if we do not follow the carbon reductions that climate scientists are telling us is needed to avoid widespread and devastating changes to our climate.

As you have said, "We are the first generation to feel the sting of climate change, and we are the last generation that can do something about it." If you really believe this, then please do the right thing for our children and direct the Department of Ecology to take the strong actions that are needed while we still have a chance to avert catastrophe.

The Department of Ecology has been given an order by King County Superior Court Judge Hollis Hill to follow climate science, and make a Rule that could ensure clean air and a livable climate for the children. As she wrote, "These children cannot wait."

The path to climate stability is becoming more challenging by the day. This is why we in Washington state must stand up to do our fair share for our world and our children. It is clear that the state legislature is not stepping up to leadership on climate—it is not taking action to ensure that young Washingtonians, and the generations to come, have a stable climate. It's up to you in the Department of Ecology-- please act boldly to create stronger reduction targets, based on the science.

Sincerely,



Jared Howe

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Seattle, WA 98108

jaredchowe@gmail.com

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Dept of Ecology

Testimony before the Washington State Department of Ecology
on its Proposed Clean Air Rule, Olympia Public Hearing
Jessica Koski, Sierra Club
July 14, 2016

My name is Jessica Koski, and I am an organizer on the Sierra Club's Beyond Coal Campaign. Thank you for the opportunity to testify.

The Sierra Club applauds Governor Inslee and the Department of Ecology for acting on climate change, particularly given that our state legislature has failed to do its fundamental duty to protect Washington residents.

The proposed Clean Air Rule has the potential to be critically important tool for reducing Washington's emissions from natural gas plants and from preventing the utilities from investing in new natural gas infrastructure, which both Puget Sound Energy and Avista are already planning on.

Unfortunately, the current draft of the rule forsakes this opportunity by allowing utilities to comply with the federal Clean Power Plan, if it is enacted. Yes, it is true that this exemption only applies if the state implementation plan is "greater" than the current federal targets. But the federal targets are so abysmal that this vague guarantee is effectively meaningless.

The federal Clean Power Plan does, at best, do nothing for Washington. It could in fact lead to more pollution. Washington's federal standard is so low that it would result in federal carbon credits or headroom for compliance. Washington's natural gas plants then get to increase their emissions as coal plants throughout region retire.

Do we really want to make a rule that would likely raise emissions the benchmark for climate action in Washington?

With this in mind, we call on the Department to ensure that the final Clean Air Rule only exempt utilities for complying with the state's implementation of the Clean Power Plan if its targets exceed those in Ecology's rule. Also, the current target of 1.7% annual reductions is grossly inadequate. We can do better. We must do better. We need ambitious goals based on the best available science.

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Dept of Ecology

NAME Oleksandr Kuzura

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COMMENTS (Please use as many sheets as needed)

I am a college student and I'm concerned.

I only ~~have~~ have a right to what I know. Unfortunately, I don't know all the science, the ecology, the ^{statistics} numbers, nor the reasoning behind Ecology's inadequate action. ~~Who~~ knows I know this: My most formative experiences have occurred in the great outdoors. The clarity of mind that is ~~lost~~ ^{suffocated} ~~lost~~ ^{choked} by today's technological onslaught can breathe freely when in the outdoors. I feel a freedom and a space in my heart. My backpacking, canoeing, and bicycling make me a kinder person, who in turn can spread kindness to others when I return home. The same kindness that is burned out by the wild fire of industrialized cities. The same kindness the world desperately needs to escape our epidemics of war, depression, and despair.

Ecology, I've seen the benefit the great outdoors brings to all people. It's a regenerative space. A healing space. A learning space. A curiosity space. I'm studying engineering to create technology to boost energy efficiency and preserve this space. I come to intern in your government to work on replacing the vehicle fleet with electric vehicles. To play my role in advancing the greenest state's the most progressive governor's agenda to save our planet. Imagine

my disappointment when I see ecology dragging their feet on climate action. 1.7% reductions aren't enough to make a stable climate. Not to mention the poor example such lax action gives to other states. Washington is the most environmentally advanced state. The technology is here. The ~~pe~~ people's support is here. So why does "the people's government" this democracy shut their ears to the people? ~~is~~

~~is~~ Why, when all the resources are there, when support is here, when danger is here, do you take conservative action? Now is the time for risk. Now is the time to rage against climate change. We're standing on the edge of geopolitical conflict, water scarcity, mass and mass extinction, including our own.

Be brave, ecology. Be brave. Be brave. Face the threats of litigation. Say no to industrial pressure. Go for broke, be brave. We stand to lose everything and gain survival. Either we act now, or we act later, when it's too late. Or we don't act at all. Then it's already too late. Which will it be?

You hold the key. Power is in your hands, and you stand in the most noble position of power. Be brave.

I want people, my fellow humans, to breathe clean air. To derive great pleasure from beautiful nature. To restore our hearts and souls in the face of technology's ~~too~~ greed. To teach kids about true bonds. To inspire, wow, and improve. Please be brave. Aim high. Set higher goals. Lead by example. By brave example. For all our sakes.

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NAME Robert Marsh

JUL 14 2016

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Dept of Ecology

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COMMENTS (Please use as many sheets as needed)

A greater annual reduction is needed than 1.7%

The annual reduction needs to be shown to be based on current climate science.

Climate science and a stable climate should be the primary drivers of this policy.

I do not see how this rule meets or can meet the reductions which ~~the~~ the Department of Ecology has on the record is necessary for WA to do it's share ~~needed~~ to mitigate climate change to safe levels. I have not heard these points expressed by Ecology.

I believe any rule should be consistent with global climate goals.

I believe that basing carbon reductions on the 2008 statute is neglecting the current scientific literature.

I would like to see the clean air rule demonstrate how ambitious it is relative to what is the statutory limit of emissions reductions.

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JUL 14 2016

NAME Ellen McKinley

Dept of Ecology

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COMMENTS (Please use as many sheets as needed)

I would testify, but I don't think I could get through it without choking up. As a preschool teacher (formerly a practicing attorney), I have the opportunity to envision my students' futures (as well as my 18-year-old daughter's future).

I am profoundly perplexed about government's failure to recognize and adequately address climate change. For decades, the science has been clear. We need to take significant action to prevent catastrophic consequences.

We are already nearing tipping points that are dramatic and perhaps irreversible (e.g., melting glaciers). Under the Public Trust doctrine, the state must preserve the atmosphere for future generations. The annual reduction must be greater than the current rule provides.

Based on best available science, greater percentage reductions are required now!

Eight percent minimum is a good start.
We can do this! We must do this!!!

For the good of the planet and our species,
and the other beings we share it with.

*How will melting glaciers impact hydro power generation?
Has this been factored in?

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Dept of Ecology

NAME Tess L Morgan

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COMMENTS (Please use as many sheets as needed)

International and Domestic Companies should be held responsible. Coal Plants should be regarded as part of this rule. Please support the closure of all coal plants in the State of Washington and nationwide. All business and government entities, including public UTILITIES such as Puget Sound Energy should be covered under this rule.

The Paris Treaty agreement and international stipulations and guidelines should be leading decision benchmarks. Alternative Energy sources to Coal, oil, natural gas, methane and petroleum sources of carbon contributions should all be reduced, removed and replaced by solar, wind and in a manner that retrains displaced workers and community improvement of transportation such as railroad tracks and public transportation.

Cancer and public health costs should be added into tangible projected damages and risk to be responsible for as collateral damage to be prevented across seven generations.

Thank you for your time and consideration.
Ecological stewardship is of great importance
to me, I value your leadership.

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JUL 14 2016

Dept of Ecology

NAME Bill Phipps
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COMMENTS (Please use as many sheets as needed)

Thank-you for having us here tonight.
This is about climate change, Climate change
~~is~~ is happening now And it's happening
much faster than anyone expected,
We are facing a crisis now,
We must act now.
It is up to us... there is no
we can look to, Change comes from
the bottom up not the top down,
Time is of the essence, We must act, Now.
We must stop mining coal, period. now
We must stop mining bakken oil, period. now
We must stop exporting coal to Asia, period. now
Let's do everything we can, lets do it
together, let's do it for the kids,
lets do it for this beautiful little
planet we call home,
Thank you for listening,
We are counting on you to act, now,
If we need an 8% reduction in emissions
then we should go for 16% reduction,

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JUL 14 2016

PUBLIC COMMENT SHEET

Dept of Ecology

NAME BRIAN REINDEL

ADDRESS 310 S. 174th PL. #J BURIEN, WA 98148

EMAIL brian.reindel@gmail.com

COMMENTS (Please use as many sheets as needed)

As a resident of SEATAC/BURIEN I urge you to extend the authority of this ~~rule~~ rule as far as possible into the transportation and aerospace industries, echoing concerns raised by those already here tonight about the severity and immediacy of the climate change threat. The SEA-TAC region's residents constitute a "front-line" community disproportionately affected by local emissions generated by air transportation.

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PUBLIC COMMENT SHEET

Dept of Ecology

NAME Ryan Rittenhouse

ADDRESS Portland, OR

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COMMENTS (Please use as many sheets as needed)

Please make your rules as strong as possible and continue to improve them into the future. We are already far behind what we need to do in terms of carbon pollution reduction as both a country and a planet. Washington needs to be a leader in transitioning away from a carbon, fossil-fuel based economy for the sake of environmental and social justice issues. We must compensate for the irresponsible practices of the past and others who refuse to take meaningful action on this issue.

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Dept of Ecology

NAME Nancy Shimeall
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Redmond 98052

COMMENTS (Please use as many sheets as needed)

I spent 3 days on the capitol steps in a vigil that feels very personal, but also very universal.

~~There~~

I'm sure you, the Dept. of Ecology, love this planet too—and you want to do the morally righteous thing in the clean air rule. So thank you.

We can't deny the facts, especially in the face of declining salmon, the acidification, warming, and pollution of our Puget Sound; the extreme, record-setting heat, devastating wildfires, and flooding; ~~these are the~~ melting glaciers and early snowmelt. So the facts are revealed by how our earth is reacting. We humans have altered the chemistry of our world.

And while I worry and grieve about our present ~~and~~ and future generations (I am a mother and a teacher) I also feel great sadness for what we humans are doing to other things in our world. All the things we are changing, and living things cannot adapt and evolve fast enough to survive

as they exist today,

We may be too late.

Some scientists believe we are.

But this clean air rule is a chance! We must make it strong, so that we all have a chance to stabilize the oncoming climate crisis. We must push past deniers and set 8% CO₂E as our goal. We must not allow fear of political issues, or lawsuits from big polluters!, to stop us from doing what is morally righteous.

Even setting 8% as our goal in 2017 is not a guarantee that we will slow down climate change. But if big polluters don't change, we have no hope.

Change is hard. And we all have to change, in small and large ways, to stabilize our climate.

Please please set a stronger CO₂E emissions target, starting in 2017, = 8% or more

We the people will support you. We promise.

Thank you.

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Dept of Ecology

PUBLIC COMMENT SHEET

NAME Lauren M. Tozzi
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COMMENTS (Please use as many sheets as needed)

In a landmark decision - Judge Hill declared "the youths very survival depends upon the will of their elders to ACT NOW - decisively and unequivocally, to stem the tide of global warming - BEFORE doing so becomes first TOO COSTLY and then TOO LATE.

The State has ~~no~~ constitutional obligation to protect the public's interest in natural resources held in trust for the common ~~people~~ benefit of THE PEOPLE!

We owe the children (our future)
A SCIENCE-BASED RULE!
for #ClimateRecovery

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PUBLIC COMMENT SHEET

Dept of Ecology

NAME MARY WATT

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COMMENTS (Please use as many sheets as needed)

We need bold action now to avoid climate change disaster. The proposed rule does not go far enough to avert climate change/global warming. We need to reduce carbon emissions by at least 8% per year. Large polluters are responsible for about 2/3 of carbon emissions in Washington state! The ecology Clean Air Rule calls for an effective reduction rate of 1.7% per year for carbon emissions.

Recently we have heard that the devastating effects of climate change are going to be worse than has been projected. Our planet is in peril and humankind is in peril. I am very concerned for the planet for future generations even though I do not have children.

I would like to see Washington become a

leader in reducing carbon emissions. I'm proud of the state I was born in, Washington state.

At this crisis in global warming we still have time to act to reduce carbon emissions. We do not have time to put the interests of business profits ahead of reducing carbon emissions and saving our air, water, land, flora, fauna, and people.

We need a stronger clean air rule to reduce carbon emissions from large polluters by at least 8% per year in Washington.

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PUBLIC COMMENT SHEET

Dept of Ecology

NAME Mikala Woodward
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COMMENTS (Please use as many sheets as needed)

I'm here because I have 2 children, Josie and Simon, whom I love, as I often tell them, more than I ever thought it was possible to love anyone.

They grew inside my body. I nursed them. I wiped their butts; I held them when they cried; I scraped their spilled pasta off the floor; I drove them to soccer and roller derby practice.

And I spend a lot of time fending off my fear and despair about the world I am sending them out into, the future they face.

Sometimes I'm able to distract myself from this dread. Other times I am overwhelmed by grief and sorrow. ^{*ATTOR}

~~Maybe~~ I have slowly come to understand that what lies beneath that grief is actually love. The love I feel for Josie and Simon, for their friends and cousins, for the species and places we are losing to climate change.

I believe that if we could bring ourselves to put aside our graphs and numbers and face that grief head on, if we let ourselves really feel what is at stake here, then the love that underlies that grief would overwhelm us, change us, and propel us into action.

We would have a clean Air rule based on science, yes, but also based on love.

As any parent knows, love does whatever it takes, more than we ever thought we possibly could, to make sure our kids are safe, that they have what they need to survive and thrive.

I am here to ask for that rule.

1102 A Creekwood Ct. SE
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zeiglerbob@msu.com

July 8, 2016

Mr. Sam Wilson
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600
AQComments@ecy.wa.gov

RE: Public Hearing: Clean Air Rule

Dear Mr. Wilson,

Thank you for the opportunity to comment on your proposed Clean Air Rule for Washington State. I am a retired biologist and for more than 3 decades at Department of Fish and Wildlife, I worked with Ecology on Rule and Guidance documents mostly in wetlands and aquatic issues and on interagency committees. I know the hostile political environment and constraints the Department of Ecology works under to secure funding for programs in the agency. I know this has led Directors at Department of Ecology to tell staff their client is not the environment but rather those industries they were regulating and Ecology would develop stakeholder committees to reach compromises.

I also realize that Rules flow from Legislation and the Legislation that Ecology has to work with was from 2008- **RCW 70.235.000 which states: Findings—Intent.**

(3) It is the intent of the legislature that the state will: (a) Limit and reduce emissions of greenhouse gas consistent with the emission reductions established in RCW [70.235.020](#); (b) minimize the potential to export pollution, jobs, and economic opportunities; and (c) reduce emissions at the lowest cost to Washington's economy, consumers, and businesses.

- By 2020 reduce all GHG emissions in State to below 1990 levels.
- By 2035 reduce GHG emissions to 25% below 1990 levels.
- By 2050 reduce GHG emissions to 50% below 1990 levels.

One thing that is important to realize is we are at a new era in 2016. We have much greater information on the severe dangers of continuing greenhouse gas emissions and climate change impacts occurring faster than anticipated. We live in a post Paris Climate Agreement world that started nations to move to reduce impacts. Our science tells us we must be more aggressive in reducing greenhouse gas emissions or may reach a point where it is too late to act. Leading US Climate Scientist James Hansen states we need to reduce our greenhouse gas emissions 8% each

year if we start right now. The amount we need to reduce goes up each year we fail to act. Note: delay increases the cost of climate stabilization to all citizens and industries in Washington State. While it is positive that Ecology is proposing to reduce emissions to 1.7% per year that is 21% of what Dr. Hansen's studies show is needed to stabilize climate to prevent climate catastrophes.

We are in a situation on air and emissions similar to what people in Flint, Michigan are experiencing in drinking water. When at a level of survival, a 25% reduction in lead in the case of Flint's waters or in Greenhouse Gas Emissions in the case of our air is definitely inadequate. Twenty-five percent or even fifty percent of survival level does not get you to survival.

Science shows there would be significant impacts to all aspects of human health, lives and all elements to the environment from Greenhouse Gas Emissions. When Ecology rule falls so short of GHG emission limits that science shows are needed, how can the Department claim: "Ecology does not have any information that would suggest there will be significant adverse environmental impacts as a result of the proposed rule." It seems that any rule with inadequate limitations to prevent significant impacts would require a Determination of Significance, and EIS.

All government bodies including Washington Department of Ecology have responsibilities for public health, safety and welfare.

I strongly recommend that Ecology incorporate Dr. Hansen's science into any GHG rule that would not have a significant impact on the environment (and avoid need of an Environmental Impact statement) and provide for Washington State citizens' public health, safety and welfare.

Thank you very much,


Bob Zeigler

Attachment 1

Leading US Climate Scientist James Hansen on Ecology's Clear Air Rule

"Emission reductions of only 1.7 percent per year are not much different than business as usual," Dr. James Hansen, Director of the Climate Science, Awareness and Solutions program at Columbia University, said. "They would leave young people with an intolerable burden to somehow suck enormous quantities of CO₂ from the air if they are to avoid a climate system

running out of control. The state should live up its obligations to young people, reducing emissions 8 percent per year, which is what the science indicates is needed to stabilize climate.”

Hansen Science Summary

- The critical goal is to bring down the level of carbon dioxide, the major greenhouse gas, to 350 parts per million by 2100. 350ppm is where planetary energy balance is restored – The planet is no longer taking in more solar energy than it is sending back to space. (The level has now reached 400 ppm, spiking recently over 407ppm, and in fact grew at a record pace in 2015.) Staying above 350ppm much longer than 2100 risks radical climate feedbacks.
- Achieving 350ppm x 2100 requires immediate and large carbon pollution reductions. If the world had started in 2013, an annual rate of 6% would have been needed. If we wait until 2020, the figure grows to 15%. In 2016, the figure is probably around 10%. Besides pollution reductions, 100 billion tonnes of carbon must be soaked from the atmosphere into plants and soil.
- The threshold for dangerous climate warming is sometimes given as 2° Celsius, or the more ambitious 1.5° C limit set at the recent Paris climate summit. The 350ppm pathway would hold total warming to the peak seen since the last ice age, just a little over 1°C, with a temporary spike this century around 1.2°C. Hansen asserts we should aim at the lower temperature target to reduce the odds for dangerous feedbacks. Warming of recent months puts us in this range, underscoring the urgent necessity for rapid carbon reductions.

For complete Science Study see:

<http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0081648>