

**From:** [Jenna Kay](#)  
**To:** [Cnty 2025 Comp Plan](#); [Jeffrey Delapena](#)  
**Subject:** FW: Cap-and-Invest: Technical analysis on facility-specific greenhouse gas emissions cap policy recommendation now available  
**Date:** Monday, March 16, 2026 11:43:33 AM

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For the record

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**From:** Don Steinke <crvanwash@gmail.com>  
**Sent:** Monday, March 16, 2026 11:28 AM  
**To:** Heidi Cody <hcodystudio@gmail.com>; Small, Rebecca <Rebecca.Small@cityofvancouver.us>; Jenna Kay <Jenna.Kay@clark.wa.gov>  
**Subject:** Fwd: Cap-and-Invest: Technical analysis on facility-specific greenhouse gas emissions cap policy recommendation now available

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From Don Steinke

This is crazy.

fyi

"Ecology is charged under the CCA with making sure that Overburdened Communities OBCs highly impacted by air pollution are not continuing to bear disproportionate environmental impacts as we work to limit greenhouse gas emissions." However . . .

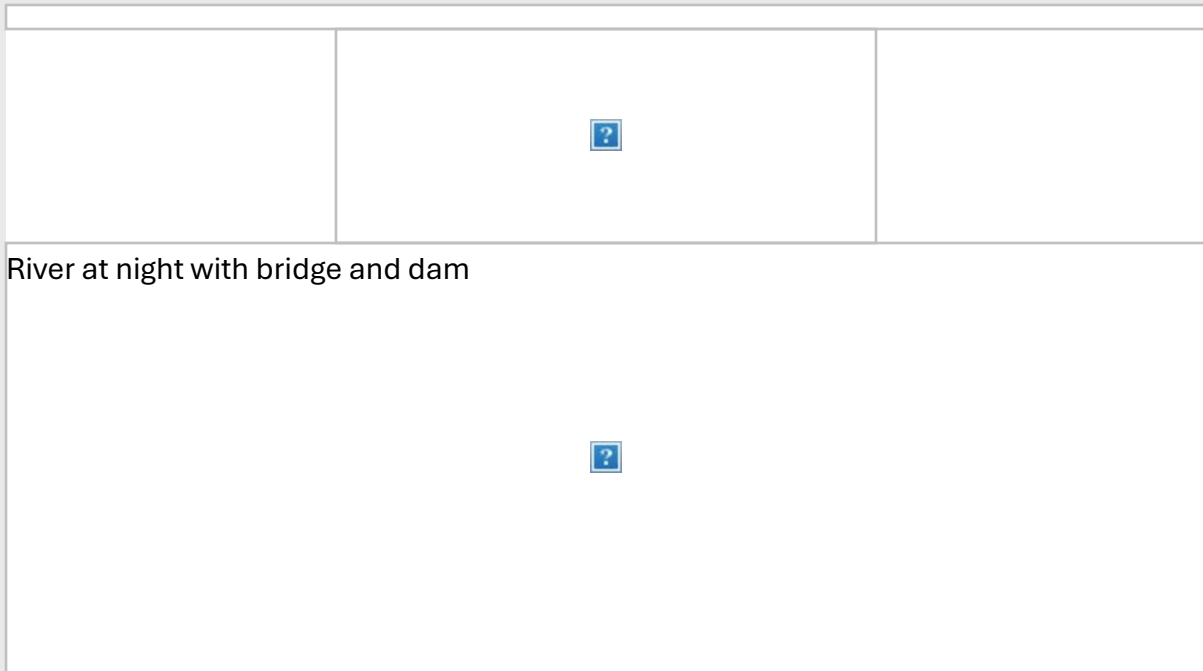
"There is no provision under the CCA that gives Ecology explicit authority to implement such a policy. This policy is not contemplated under the statute, nor does there appear to be any other basis for Ecology to implement such a program under existing law. A policy shift of this magnitude in the CCA would likely have to be authorized by the Legislature."

Source:

chrome-extension: <https://apps.ecology.wa.gov/publications/documents/2614022.pdf>

----- Forwarded message -----

**From:** Washington Department of Ecology <[waecy@public.govdelivery.com](mailto:waecy@public.govdelivery.com)>  
**Date:** Fri, Mar 13, 2026 at 12:42 PM  
**Subject:** Cap-and-Invest: Technical analysis on facility-specific greenhouse gas emissions cap policy recommendation now available  
**To:** <[crvanwash@gmail.com](mailto:crvanwash@gmail.com)>



## Technical analysis on facility-specific greenhouse gas emissions cap policy recommendation now available

Ecology has published a technical analysis of facility-specific greenhouse gas emissions caps, a policy recommended by Washington’s Environmental Justice Council. Ecology was asked to consider this policy in response to Washington’s efforts to link its Cap-and-Invest market with the California-Québec carbon market.

Facility-specific caps on greenhouse gas emissions would mandate that certain facilities reduce their annual greenhouse gas emissions at the same rate as the overall, statewide limits, in an effort to reduce criteria air pollution. The analysis explores the policy’s potential effectiveness and feasibility under Washington’s existing laws and rules.

This report is part of our ongoing work to analyze the Climate Commitment Act’s linkage criteria and prepare an Environmental Justice Assessment on linkage.

[Read the report](#)

## Related links:

- [Cap-and-Invest linkage webpage](#)
- [Improving air quality in overburdened communities](#)

### Cap-and-Invest linkage team

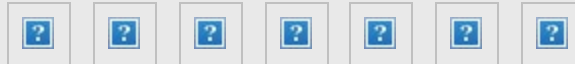
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