

TIER Environmental Forecast Group
advocates for the West
irWorks, Inc.
Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
The Apollo Alliance
Audubon Washington
Bonneville Environmental Foundation
Central Area Motivation Program
Citizens Utility Board of Oregon
City of Ashland
Clackamas County Weatherization
Climate Solutions
The Climate Trust
Community Action Partnership of Oregon
Community Action Partnership Assoc. of Idaho
Conservation Services Group
David Suzuki Foundation
Earth and Spirit Council
Earth Ministry
Ecos Consulting
Formative Options, LLC
Emerald People's Utility District
The Energy Project
Energy Trust of Oregon, Inc.
EnXco Development Corporation
Environment Oregon
Environment Washington
Grasslands Renewable Energy
Home Performance Guild of Oregon
Home Performance Washington
Housing and Comm. Services Agency of Lane Co.
Human Resources Council, District XI
Jerrola Renewables
Joho Conservation League
Joho Rivers United
Joho Rural Council
Joho Wildlife Federation
Interfaith Network for Earth Concerns
Jootenai Environmental Alliance
Laborers International Union of North America, NW Region
League of Women Voters - ID, OR & WA
Local Energy Alliance of Washington
Metrocenter YMCA
Missoula Urban Demonstration Project
Montana Audubon
Montana Environmental Information Center
Montana Public Interest Research Group
Montana Renewable Energy Association
Montana River Action
Montana Trout Unlimited
Toontown Foundation
The Mountaineers
Multnomah County Weatherization
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Alliance
Northwest Energy Efficiency Council
Northwest Renewable Energy Institute
Northwest Solar Center
NW Natural
NW SEED
Olympic Community Action Programs
Opportunities Industrialization Center of WA
Opportunity Council
The Pacific Coast Bank
Oregon Action
Oregon Energy Coordinators Association
Oregon Environmental Council
Oregon HEAT
Oregonians for Renewable Energy Policy
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Pacific Rivers Council
The Policy Institute
Portland Energy Conservation Inc.
Portland General Electric
Puget Sound Alliance for Retired Americans
Puget Sound Cooperative Credit Union
Puget Sound Energy
Renewable Northwest Project
River Network
Salmon for All
Save Our Wild Salmon
Seattle Audubon Society
Seattle City Light
Sierra Club
Sierra Club, Idaho Chapter
Sierra Club, Montana Chapter
Silicon Energy
Snake River Alliance
Solar Oregon
Solar Washington
South Central Community Action Partnership, Inc.
Southeast Idaho Community Action Agency
Southern Alliance for Clean Energy
Spokane Neighborhood Action Programs
Smart Grid Oregon
Student Advocates for Valuing the Environment
SustainableWorks
Sustainable Bainbridge
Washington Audubon Society
Trout Unlimited
Union Of Concerned Scientists
United Steelworkers of America, District 11
VA CTED - Housing Division
Washington CAN!
Washington Environmental Council
Washington State University Energy Program
World Institute for a Sustainable Humanity
World Steward



NW Energy Coalition
for a clean and affordable energy future

July 20, 2012

Ms. Linda Whitcher
Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Whitcher:

The NW Energy Coalition is a 30-year old alliance of 115 Pacific Northwest environmental and civic organizations, clean energy companies, faith communities and utilities working together for clean and affordable energy. Forty-seven of our member organizations call Washington home.

One of the key benefits of our work to increase energy efficiency and the supply of clean, renewable energy resources is reducing our state's contributions to climate pollution. Consistent with numerous state policies and laws, huge investments in energy conservation and renewable energy have been made across the state, avoiding the need to build five fossil fuel power plants and annual emissions of more than eight million tons of climate pollution.

Given the progress being made by Washington's energy sector to reduce its carbon footprint, it is extraordinarily frustrating that the Department of Ecology intends to weaken clean air rules and avoid its duty to regulate greenhouse gases from industrial sources including oil refineries. The oil refineries account for six to eight percent of the state's greenhouse gas emissions; the Department of Ecology has the duty and the obligation to enforce the law to bring these emissions under control.

Under separate cover, the Washington Environmental Council and the Sierra Club have submitted extensive comments urging Ecology to withdraw the proposed revisions to WAC 173-400-030(3) and WAC 173-400-020 and the proposal to submit these revisions to EPA as an amendment to the State Implementation Plan. We fully endorse these comments because the proposals are inconsistent with the law, science and sound public policy.

Sincerely,

Sara Patton
Executive Director