August 25, 2023

Ms. Harrison Ashby

Rulemaking Lead

Washington Department of Ecology

***Re: CCA Funds Reporting Rulemaking Initial Input Survey***

Climate Solutions appreciates the opportunity to share initial thoughts to the Department of Ecology as it begins its Climate Commitment Act Funds Reporting rulemaking process. We are grateful for the numerous opportunities to provide comments and engage as the rule evolves. Listed below are considerations and recommendations that touch on some of the questions outlined in the survey. We hope that Ecology keeps these points in mind as it formulates processes and methods for reporting.

**Develop a centralized hub of information on CCA fund data and consider ways to make this data accessible and digestible.** As part of this rulemaking, it is important to consider ways to make the report information not only easily accessible, but easily digestible for both lawmakers and the public. We recommend centralizing this information onto an online portal that offers visual aids, such as maps and graphs, to highlight investments, their impact on greenhouse gas (GHG) reductions, and which communities they benefit and how. The California Air Resources Board’s climate investments webpage, for example, includes [a map of all investments](https://webmaps.arb.ca.gov/ccimap/) funded through its cap-and-invest program. This map includes a layer for priority populations, which are those populations that meet California’s law’s definition of “disadvantaged communities” and low-income communities. California’s annual reports also include case studies and a [StoryMap](https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/cci_annual_report_2023.pdf) – a resource similar to Ecology’s StoryMap for improving air quality in overburdened communities per RCW 70A.65.020 – to provide a narrative and demonstrate the real-world implications of investments alongside the data.

[Quebec’s data dashboard](https://app.powerbi.com/view?r=eyJrIjoiOTNhYTE3MWUtNzRhNC00OTg1LWI1OWMtZTg3MjkyNmM1NDY0IiwidCI6IjQyNjJkNGVjLTVhNjctNDk1Ny1hYmI2LWJmNzhhY2E2YTZmNSJ9), which tracks investments stemming from their cap-and-invest system’s funds, offers another useful example. This resource aggregates spending and greenhouse gas reductions and compares them to Quebec’s GHG reduction targets. It is worth noting that Quebec does not have specific requirements around spending in overburdened communities or in alignment with Tribal priorities, but a similar resource in Washington would also need to highlight investments in these communities.

At minimum, Ecology should share critical elements of its annual report onto an easily accessible web page that highlights the amount of spending on projects, the geographies in which those investments have been made, and GHG reductions as they compare to Washington’s targets in statute. Though not required by law, Ecology should also consider including co-benefits of certain projects, particularly for air quality improvement and reduction of criteria pollutants.

**Additional reporting requirements and greenhouse gas emissions analysis will require additional agency capacity.** Monitoring and data reporting are key elements for tracking the efficacy and impact of new programs and highlighting where needs and opportunities exist. However, with additional data tracking can come additional capacity needs from agencies, grant applicants, and grantees. Ecology’s guidance should consider ways to streamline reporting and utilize existing workflows where possible. For example, Ecology guidance could require that grant applications require identification of Environmental Health Disparities rank and a description of how the program meaningfully benefits overburdened communities–information that is already required of certain grant programs such as the Department of Commerce’s Electrification of Transportation Systems Grant Program.

Additionally, Ecology should consider offering training and/or technical assistance to support agency staff with new GHG tracking and reporting requirements that result from the rule.

**Ecology staff should work with the Environmental Justice Council to offer guidance to agencies on best practices for identifying overburdened communities and defining meaningful benefits.** During the climate funds reporting public meeting held on August 10th, Ecology staff shared that each agency would have discretion to operationalize the definition of overburdened communities and determine whether a certain project brings meaningful benefits to those communities. While flexibility is important given the various types of programs that are funded through the CCA, Ecology should work with the Environmental Justice Council and solicit feedback from highly impacted communities and other interested parties to determine best practices for identifying overburdened communities and offer guidance on defining meaningful benefits. This will help ensure that benefits are reaching intended communities and that the State meets requirements laid out in statute.

We look forward to continuing to work with Ecology on this rulemaking and future rulemakings to support effective and equitable implementation of the Climate Commitment Act. Thank you again for the opportunity to provide input.

Sincerely,



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