

Lael White

What questions do you have about this rulemaking?

Thank you for this opportunity. My concerns are listed on the following comment box and subsequent boxes.

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Thank you for this opportunity to comment. My concerns are that the following areas are considered when drafting rule-making for reporting use of CCA funds.

* Strict auditing of data, fact checking and cross referencing, using data from other agencies and groups.

* If annual emissions reductions are not verifiable, or not available annually, then participants must provide timeline projections and amounts of emissions reductions anticipated and this data must be re-evaluated each subsequent year;

* Define "verifiable" in connection with the above requirement to verify emissions reductions.

* Projects and programs need to have timeline parameters stipulated for achieving and reporting emissions reductions and as above, those need to be quantified or projected, and those projections adjusted annually;

* Carbon inputs need to be included in program reporting and updated regularly.

* Environmental Justice reporting should include projected ridership for any transportation program and what % is inclusive of overburdened populations.

* "Overburdened populations" needs to be defined, with direct input from members with lived experience of being members of overburdened communities. (Honor the equity requirement - "nothing about us without us".)

* Clearly define "Transit" in Climate Transit Programs Account and be sure the definition includes all passenger rail operating under all jurisdictions that fall within WA State, and specifically including the State intercity passenger rail program, Amtrak Cascades, and all Amtrak long distance service that operates within WA State.

What hopes do you have for this rulemaking?

* Build in excellence in the model as an example for other agencies and for generating political support.

What barriers might make it harder to participate in this rulemaking? What scheduling, accessibility, or other changes might make it easier?

* Build in ample access to the rule-making process from disadvantaged or disabled communities and for people who work during the day,

What else would you like to share?

We provide a professional resource for planning projects involving passenger and freight rail integration with other transit, with highway planning, and with jurisdictional comprehensive planning. We are committed to utilizing our rail assets as a significant way to reduce emissions from transportation. info@climaterailalliance.org