

September 26, 2023

Harrison Ashby, Rulemaking Lead
Department of Ecology

Subject: Rulemaking on Chapter 173-446B WAC – Climate Commitment Act Funds Reporting

Dear Mr. Ashby:

Please accept the following input for the proposed new rule Chapter 173-446B WAC, Climate Commitment Act Funds Reporting, which will establish reporting requirements for recipients that receive cap-and-invest auction revenue.

What information should Ecology provide in its annual report?

We would like to see reporting of CCA obligations at least twice a year, with one update being issued no later than October of each year for legislative planning. A dashboard would also be a good alternative. Suggested elements to include in reporting are:

- Quantitative break down of allocations by [EJ Council Major Areas of Community Investment, Participatory Budgeting, and TA + Studies and Assessment](#), percentage allocated to overburdened communities and/or vulnerable populations.
- Project information: scope, geography, populations being served, and how the project utilized the leadership of frontline communities
- Qualitative reporting that includes testimony from community feedback.
- Model processes for identifying overburdened communities and vulnerable populations.
- Narrative that tells about the outcomes of funded projects, health disparities being addressed, unexpected negative consequences or lessons learned.

What additional information should be included about spending that is formally supported by a Tribal resolution?

No comment.

What additional information should be included about spending that benefits vulnerable populations in overburdened communities?

- What health disparities are being addressed and how.
- How project is being evaluated.
- What is the timeline for measuring project outcomes, ie air quality.
- Who will be involved in the identification of “vulnerable communities” – will DOE consult with other agencies or the community to make these determinations?
- Are transient populations (those living homeless, for example) considered in the identification of vulnerable populations?

- Define what “direct and meaningful benefits” to vulnerable populations are and how expenditures reflect these benefits.

How should Ecology determine which projects are required to report their GHG emissions reductions?

Projects related to:

- The transportation system (to include the ferry system) – such as improving transit service, incentivizing active transportation
- Weatherization/building electrification and decarbonization

It would also be worthwhile to come up with a calculation to determine how projects related to climate mitigation (including climate mitigation planning, hiring staff, education and outreach) contribute indirectly to GHG emissions, rather than just excluding them from reporting. How do we put a value on these activities?

What should Ecology consider when determining how to evaluate greenhouse gas emissions reductions from projects?

- Other environmental impacts beyond gas emissions – ie water quality and protection efforts, greening, additional jobs or learning opportunities created in climate resilience for example.
- How do other states (ie. CA) evaluate GHG emissions?
 - How do these methods need to be adapted to account for differences in WA’s climate, soil, etc?
 - What methods are missing when we look to other states for this type of information?
- How will emissions be “verified”?
- What level of evaluation is cost-effective?

What else would you like to share?

We are excited to continue to partner on CCA and HEAL Act implementation Thank you for continuing to deliver on the promise of environmental justice so that all communities in Washington can thrive, no matter where they live, work, play, and learn.

Sincerely,



Erika Bartlett
Policy and Legislative Liaison, Environmental Health