

# Washington Conservation Action

What information should Ecology provide in its annual report?

Ecology should provide accessible, well-documented, and clear information to the legislature and the public in each annual report. Each report should include meaningful summaries, relevant analysis and interpretation, and a focus on impacts to vulnerable populations in overburdened communities and programs, activities, or projects formally supported by Tribal resolutions. Each report should also focus on real, verifiable, and additional greenhouse gas (GHG) reductions achieved, as well as any associated reductions of co-pollutants. For projects focused on natural or working lands such as forests, reports should separately consider both carbon storage (avoided GHG emissions), and carbon sequestration (GHG reductions). <br> <br>For each project, reporting should identify, at a minimum: <br>- administering agency; <br>- project purpose; <br>- lead organization; <br>- amount funded, amount allocated, and amount expended to date; <br>- project duration; <br>- location; <br>- GHG emissions and reductions if relevant; location of projects relative to overburdened communities; <br>- the amount and percent of funds benefitting vulnerable populations in overburdened communities; <br>- environmental, social, and economic co-benefits of the project (such as criteria pollutants reduced, public health impacts, jobs created, cost savings, etc.). <br>

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

Ecology must uphold its existing obligations to proactively and meaningfully consult with federally recognized Tribes. This includes, but is not limited to, information to be gathered about spending that is formally supported by a Tribal resolution. Respect for tribal sovereignty and treaty rights must be foundational to this rulemaking and across all processes to implement the CCA.

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

Ecology should comprehensively integrate the collection of information for its annual report with its obligations under the HEAL Act, including but not limited to the requirements identified in RCW 70A.02.050, RCW. 70A.02.060, RCW 70A.02.080, RCW 70A.02.090, and RCW 70A.02.100. <br> <br>Close coordination with the Washington Environmental Justice Council will be critical to inform requirements for evaluating and reporting direct and meaningful benefits to vulnerable populations in overburdened communities. It will be imperative for Ecology to prioritize and incorporate any recommendations from the Council in this regard, and to ensure that the Council has received all information and engagement it identifies as necessary before finalizing these

requirements. <br> <br>It will be particularly important to make sure that qualitative information and feedback from impacted communities is incorporated into the report, in addition to quantitative data. It will also be important to include information about any unanticipated negative impacts and areas needing improvement. <br> <br>Reporting should, at a minimum, identify populations served, the process used to identify overburdened communities, and community engagement and public participation activities completed according to the HEAL Act, RCW 70A.02.050.

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

All projects funded by cap-and-invest auction revenues should be required to report on the net GHG emissions reductions or increases associated with their implementation. If a project does not result in quantifiable emissions reductions, Ecology should require an explanation of other project benefits that align with the intent and requirements of the Climate Commitment Act. <br> <br>For projects focused primarily on benefits other than GHG emissions reductions, such as resilience projects funded by the Natural Climate Solutions Account, reporting on GHG emissions reductions would ideally be accompanied by other quantifiable outcome measurements, e.g. provisioning of water resources or other ecosystem services, or reduced risk of disturbance.

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

Similar to how offsets are assessed under Chapter 173-446-500 WAC, projects receiving funds should be able to demonstrate permanence, additionality, quantifiability, verifiability, and direct environmental benefits to the state. Ecology should ensure project emission reductions are not being double-counted. For example, if a project is funded on a site that is also enrolled in a voluntary carbon registry, the entity receiving funds would need to demonstrate that the GHG emission reductions funded using CCA dollars were distinct and additional to any offsets claimed in the registry. In addition to GHG reductions, evaluation should also include GHG emission increases caused by projects, in order to establish net GHG emissions. <br> <br>For projects that use predictive calculations, Ecology should also require a “true up” mechanism to determine net GHG emission impacts annually, to account for the difference between projected and realized impacts. Additionally, it will be critical for Ecology to develop a robust verification system to provide independent oversight for projects' GHG emissions reporting.

What else would you like to share?

We strongly encourage Ecology to establish a public-facing web page by the end of the 2023-2025 biennium. California's reporting webpage, <https://www.caclimateinvestments.ca.gov/>, provides a model of a comprehensive resource hub for a broad variety of stakeholders to access information in multiple formats, including annual reports, midyear data updates, interactive project maps, data dashboard, program pages, fact sheets, webinars, story maps, and more. <br> <br>Creation of a similar public-facing website for Washington, rather than solely a single annual report to the legislature, will be critical to enabling access to resources by Tribes, government agencies, individuals, businesses, organizations and others. It will also enable public transparency and independent assessment of the impacts of program investments. Finally, a comprehensive website will help ensure that the tangible benefits of the Climate Commitment Act are being communicated clearly and effectively to all stakeholders. We urge Ecology to immediately begin development of a website, and to seek additional funding in the 2024 Supplemental Budget, if needed, to establish a public facing website by the end of the 2023-2025 biennium.