



STATE OF WASHINGTON  
RECREATION AND CONSERVATION OFFICE

December 19, 2023

Harrison Ashby  
Attn: CCA Funds Reporting Rulemaking  
P.O. Box 47600  
Olympia, WA 98504-7600

RE: Comments on Draft CCA Funds Reporting Rulemaking

Dear Ms. Ashby:

Thank you for the opportunity to review the draft version of the proposed rules for the Climate Commitment Act (CCA) funds reporting. The Recreation and Conservation Office (RCO) remains committed to the climate and community benefits intended by the CCA and offers the following comments on the draft language.

**Budgetary Reporting Requirements:**

*Appropriation Level Reporting Requirements (173-446B-060)*

- “1(e) “What percentage of the funding identified in ‘C’ was used by the recipient for administrative purposes?”
  - **RCO recommends that this reporting requirement be removed from the draft language**, as it is difficult to define and likely varies significantly across different agencies in terms of how it would be operationalized and reported.
  
- “1(g)(i) “Did the activity funded through this grant or contract receive funding from sources other than CCA accounts?”
  - **RCO recommends that this reporting requirement be removed from the draft language**, as it is a relatively challenging reporting requirement. In addition, the automated reporting RCO has currently established would only share the portion of a sub-recipient’s project that was formally included as “matching funds” or funded through another account we administer, but not necessarily the full suite of funding other than CCA. We do not currently have sufficient budgetary staff capacity to report on accounts beyond those referenced in the RCW.

*Grant- or Contract-Level Reporting Requirements (173-446B-060)*

- (2)(h)(i) Did the activity funded through this grant or contract receive funding from



sources other than CCA accounts? If so, what were the sources and how much funding was provided by each source?

- **RCO recommends removing this reporting requirement from the draft language.** As previously mentioned, except for funding that has been formally reported as “matching funds” or is funded through another account we manage, this is not information that RCO will have direct access to. As a result, RCO would be required to request that the grantee or subcontractor report this information to the agency – which could present an undue administrative burden on the subcontractor, particular for smaller organizations in already overburdened communities.

### **Tribal Resolution and Overburdened Community Reporting Requirements**

- For grants and contracts that do not provide direct and meaningful benefits to vulnerable populations in overburdened communities and are not formally supported by a Tribal resolution, what were the challenges or barriers to implementing the expenditure in a way that would have satisfied these criteria? (173-446B-060)
  - The applicable RCW states a minimum percentage of investments that of investments that provide “direct and meaningful benefits to vulnerable populations...” and/or are supported by a Tribal Resolution. However, a lack of investment doesn’t imply that there were challenges and barriers, the question isn’t directly relevant to determining whether those percentages have been met and would be very difficult for recipients or sub-recipients to effectively answer. **RCO would recommend removing this reporting requirement from the draft language.** Or, alternately, if a recipient does not meet the minimum percentages at the level of an appropriation, they would have to answer the following: “For grants and contracts that do not provide direct and meaningful benefits to vulnerable populations in overburdened communities and are not formally supported by a Tribal resolution, explain why they didn’t satisfy these criteria.”

### **GHG Emissions Reporting Requirements**

*Expenditure Types Subject to Emissions Reporting Requirements (173-446B-050)*

- “(2) Expenditures that are not required to report whether the funding produced any verifiable reduction in greenhouse gas emissions may include, but are not limited to, those that involve only...(c) Climate Resiliency Projects:
  - Given how RCW 70A.65.270 is currently drafted, the Natural Climate Solutions Account (NCSA) would appear to fall under the umbrella of “Climate resiliency projects” here, such that reporting of verifiable reductions in greenhouse gas emissions would not be required from expenditures in that account. However, **RCO would recommend that the NCSA being explicitly exempted from this greenhouse gas reporting requirement,** or that Ecology

clearly defines “Climate resiliency projects” either relative to certain sub-accounts or specific activities.

Once again, thank you for the work Ecology is doing to synthesize the reporting requirements articulated in the CCA, and for the opportunity to provide feedback. If you have any questions about our comments, please contact Nicholas Norton ([nicholas.norton@rco.wa.gov](mailto:nicholas.norton@rco.wa.gov)) Policy and Planning Specialist.

Respectfully,

A handwritten signature in blue ink, appearing to read "Scott Robinson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Scott Robinson, Deputy Director  
Recreation and Conservation Office