

June 28th, 2024

Harrison Ashby
Rulemaking Lead
Washington Department of Ecology
300 Desmond Dr SE, Lacey, WA 98503

Re: CCA Funds Reporting Rulemaking Public Comments

Dear Harrison Ashby,

The Nature Conservancy (TNC) appreciates this opportunity to comment on the proposed rule language for Chapter 173-446B WAC, Climate Commitment Act Funds Reporting. Climate Commitment Act (CCA) funds are critical to decarbonizing our state. By ensuring the reporting system is effective, efficient, and transparent Ecology can support smart investments that accelerate climate action, address environmental justice, and improve climate resiliency for communities across the state.

As a result of successful rulemaking, the reporting required by this process will enable Ecology to enumerate and illustrate the impact of the CCA for climate and communities across Washington and allow for improvements to funding allocations every year, driving billions of dollars in investments as broadly, efficiently and impactful as possible. Therefore, it is critical that Ecology act on the comments of those advocating for these investments, especially those being shared by those representing overburdened communities and climate advocates.

Follow EJ Council Recommendations

TNC urges Ecology to follow any forthcoming recommendations of the Environmental Justice (EJ) Council pertaining to this rulemaking.

Useful Reports Updated Twice per Year

TNC recommends that Ecology include requirements that reports will be updated at least twice per year, once in the spring after legislative session to reflect new investments and once in the early fall to inform legislators, agencies, and advocates as they prepare for the next year's legislative session. A key part of public information is that it be accessible – ensuring that content is easy to read and engaging, includes useable data, and dashboards with searchable, filterable, downloadable data, as well as mapping to show where in Washington CCA money is benefitting communities.

Defining Vulnerable Populations in Overburdened Communities & Direct and Meaningful Benefits

In instances in which they align with EJ Council recommendations, TNC urges Ecology to follow the recommendations from Front and Centered on [how to define vulnerable populations in overburdened communities](#) and [how to define direct and meaningful benefits](#). In accordance with Front and Centered's recommendations to prioritize the most under-resourced communities for resource allocation decisions, Ecology should require that agencies report the percentage of funding going to communities ranked 9 and 10 on the Environmental Health Disparities Map and include that in Ecology's public reports.

Full Measurements of Investment Impact

One of the key values of investment reporting is the ability to show the impact of CCA investments across the state, when investments occurred and whether they were one-time or ongoing, and the multitude of co-benefits that include but are not limited to greenhouse gasses. Benefits that communities in Washington will experience from CCA investments include improved air quality, resilience to climate impacts, and jobs created in their communities. Ecology should include these benefits in your reports.

Significant funding from the CCA is dedicated to climate resilience, and agencies want and need to demonstrate the incredible impact of these investments on multiple axes of resilience. TNC appreciates that Ecology's proposed rule now includes the requirement that climate resilience projects with a greenhouse gas benefit report on their climate impact, as well as the proposed language reporting job creation data for funds from the climate investment account. The resilience and adaptation benefits of CCA funded projects should be weighed in conjunction with GHG impact, and therefore resilience and adaptation benefits should be reported alongside GHG reporting. Resilience reporting should align with the Washington State Climate Resilience Strategy. In the supporting documentation for the proposed rule Ecology states an expectation that the requirement to report on benefits to overburdened communities will make a full reporting of the CCA's benefits duplicative.

On the contrary, it is critical to understand the full scope of the CCA's benefits to Washington communities, including how those benefits are distributed to overburdened communities and vulnerable populations. Front and Centered has a series of potential metrics that Ecology could consider in their recommendations on [Defining Direct and Meaningful Benefits](#). For air quality, California Air Resources Board's GHG calculators may already include air quality benefits. Please add reporting requirements for air quality, water quality, climate resilience benefits, and expand jobs created reporting requirements to all CCA funds so that Washington's residents and lawmakers understand the full scope of the CCA investments.

Thank you for your consideration,

Jamie Stroble
Director of Climate Action and Resilience
The Nature Conservancy

Joshua Rubenstein
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The Nature Conservancy