

Front and Centered

Thank you, good morning. Davin Diaz with Front and Centered. Spelled D-A-V-I-N Diaz D-I-A-Z. Front and Centered appreciates the opportunity to provide public comment on the draft rules proposed for the Climate Commitment Act Funds Reporting. Front and Centered has already provided comments in the initial rule development phase and these comments continue to build on our prior feedback. Front and centered is a diverse and powerful coalition of communities of color-led groups across Washington state whose missions and work come together at the intersection of equity, environmental, and climate justice. As part of this work our coalition seeks government transparency and accountability. Of particular importance is the allocation of funds across the state, a process that reflects the government's willingness to implement statewide policy while simultaneously demonstrating its willingness to listen to local concerns and how to shape the programs funded. Following the submission of our written comments to Ecology in this matter, Front and Centered has also submitted a document to the Environmental Justice Council detailing how Front and Centered believes direct and meaningful benefits should be defined and operationalized under the CCA. We will also provide that document as part of our written submission later this month. In short, Front and Centered recommends the use of community health indicators to measure whether CCA funds funding allocation have led to direct and meaningful benefits. Direct benefits are those that meet community self-identified needs through self-proposed solutions. In other words, direct benefits derive from program funds and services that have positive environmental solutions and economic effects on members of vulnerable populations within the geographic boundaries of an overburdened community, specifically targeted vulnerable populations within overburdened communities, and are identified in conjunction with the targeted communities. A benefit should be considered meaningful if it achieves the community experience measurable improvement to a stated objective. In the case of CCA, a project, program, or grant provides a meaningful benefit when it reduces greenhouse gas emissions or improves environmental health for vulnerable populations within overburdened communities. Further, meaningful benefits are those that do not replicate or replace other pre-existing non-CCA state funded or privately funded efforts, but rather work independently or in concert with those programs. To determine what benefits result from the CCA funds, agencies must include a description of the project and both a projection pre-project and an assessment during or post-project of the project's impacts and those are publicly accessible on the dashboard fostered by the Office of Financial Management. The project assessment must also demonstrate the project's estimated ability to eliminate environmental health disparities and reduce greenhouse gases in overburdened communities. Thank you for your time.