

Jack Howard

June 26 2024

If there can be a general criticism of an overall **very** effective document, it might well be an assumption that informs much of the document: “the whole is more than the sum of its parts.”

This is reflected in several important categories that might suggest the inability of having a truly coordinated system. It’s possible to envision the need in much the same way that at the federal level, Kennedy’s creation of a Department of Education or establishing HUD as a cabinet-level agency. Instead, as the separate comments suggest, there is a great amount of push me, pull you.

Beyond the specific comments attached into the comment, there are a few suggestions:

1. The use of the GMA may well be the best single, short-term method for broader co-ordination of addressing climate change, but is specifically **underutilized in recognizing the necessity for inter-county resource and climate health management**. As currently used, the GMA prioritizes county comp plans at the expense of the regional coordination that is essential. This is especially true in the climate-resource rich rural areas. In a similar vein, the SEPA process is (apparently) not at least mentioned, specifically, once.
2. There is a notable **lack of fuller (direct) coordination with local health jurisdictions**. The definition of ‘health’ is a recurring word in the draft, but without a theme. The word ‘health’ or ‘healthy’ is used more than a hundred times, but only generically. While laudable as a partner in the Interagency group, there is a real problem with this “top around” structure. The State Department of Health is referenced a mere two times and local health jurisdictions, never.
3. There is a notable lack of “prior art.” In reality, there are already **established climate preservation practices** that are at risk of being undermined as unintentional consequences of “change.” This is ironic, given the emphasis on including tribal traditions and environment rehabilitation: which often creates a bias against “colonialist” practices.
4. The draft **generally suffers from being inaccessible**, due to complexity of language and the many jurisdictions: particularly to those with disabilities. A 30-day comment period is insufficient.
5. The idea for including curriculum revisions and school safety issues that are tasked to local health jurisdictions (including playgrounds and attendant immunity issues) suggests that the **Office of the Superintendent could be more involved in many aspects of the CCA**. Similarly, the repeated presence of UW and WSU suggests a somewhat exclusionary approach to the two other major regional universities, and possibly private colleges.
6. **Workforce development and addressing a pending insurance crisis** for climate effects are glaring drivers for long-term measures of ROI that will ultimately dictate a non-partisan embrace, and received scant attention from existing planners.
7. **The lack of coordination with Oregon** especially, negatively impacts rural border counties such as Walla Walla. This also true at a very time when FEMA coordination has emphasized the necessity for broader, cross-border planning. The Interagency team will benefit from being informed by the presence of the State EMD. This ‘coordination’ issue also seems evident in the lack of burly attention to the Columbia River and its watershed, or areas beyond the Sound, such as Grays Harbor (raising NOAA issues) or the Willapa Bay, and associated air quality issues with Idaho: all requiring federal funding and broader coordination than what may become an intra-state ‘echo chamber.’

Specific Suggestions:

- A. Ecology's recent grants for energy efficient projects have highlighted significant problems with local involvement. Several counties waited to the end of the application process before attempting to submit work proposal: rather than being guided by an active embrace of climate change, the emphasis on "free money" predominated some applications---which arguably leads to weaker projects and a lack of coordination, as well as erosion of public support for what can be seen as a "boondoggle." Very few jurisdictions outside of Yakima and Spokane received funding. Having a more coordinated panel approach to the distribution of grants with a statewide and regional emphasis will help insulate this major problem. A broader committee review, including farmers/citizen scientist, local Chambers of Commerce---will also help with the goal of using projects such as in Moses Lake "food security" replicable. The comp plan funding to Klickitat *might* be a better model (and opportunity) if it funded a regional approach, with neighboring counties. This is especially timely given the current timing involved in comp plan updates in Eastern Washington.
- B. Develop a permitting matrix to assess climate impacts in types of building and land use applications.
- C. Assess specific goals for local health jurisdictions with specific statutory authority in climate effects and monitoring, beginning with heat-related emergencies, and authority for regional reporting.
- D. Adopt metric standards such as CHARS to guide agency actions, and to set public health outcomes, in order to align WAC 365-195 to this Resilience Strategy for public health jurisdictions.
- E. Develop and eventually implement "best green" contracting guidelines and eventually requirements, for local jurisdictions' public expenditures.
- F. Initiate a review system of SEPA filings in the Register to ascertain: the levels of relative compliance with climate-impacting effects required in a Checklist; the ability to improve accessibility and searchability of the Register; issue surrounding the variations in SEPA content by types of projects (starting with a review of DNSs) by county, with one objective of increasing public awareness of the public right to make and review SEPA public comment.

Respectfully submitted, and in deep appreciation for this great step forward,

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