



Kaitlyn Kelly
Department of Ecology, Overburdened Communities Grants Unit
AQcommunitygrants@ecy.wa.gov
564-233-9765

June 26, 2024

RE: Grant Design Input for Improving Air Quality in Overburdened Communities Grants

Dear Ms. Kelly,

Front and Centered appreciates the opportunity to provide input on the design of the “Improving Air Quality in Overburdened Communities” Grants program.

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. Our coalition works for a Just Transition to a future where our communities and the earth are healed and thriving, our people have dignified work, and our government values, respects, and represents us.

As part of this work, our coalition seeks governmental 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 in how to shape the programs funded.

The stated goal of this grant program is to “engage people in [16 overburdened communities and Tribes] to identify and develop projects that reduce criteria air pollution.”¹ Front and Centered submits the following recommendations in an effort to help the grant programs team design the program to best achieve this goal:

1. Allowance for Administrative Overhead

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https://ecology.wa.gov/about-us/payments-contracts-grants/grants-loans/find-a-grant-or-loan/overburdened-communities-grants?utm_medium=email&utm_source=govdelivery

- Ensure that there are no exclusions for insurance or legal fees under the allowance for administrative overhead. Grants from government entities often exclude these expenses, which can be problematic for Community-Based Organizations (CBOs), especially given the rising costs.

2. Collaborative Project Submissions

- Allow for projects to be submitted as a coalition of overburdened communities. This approach may increase the impact and scope of the projects.

3. Timeline Flexibility for Smaller Communities

- Recognize that in some smaller communities, meeting the timeline may be difficult if there are not local CBOs or organized communities. Consider providing additional support or flexibility in these cases.

4. Technical Assistance and Guidance

- Provide technical assistance to support grantees in identifying mitigation pathways that best support their community and create systemic change.

By implementing these recommendations, the grant process can become more inclusive, supportive, and effective in addressing the needs of vulnerable populations and overburdened communities.

In addition, while Front and Centered recognizes and appreciates that this grant initiative is separate from and in some ways supportive of other efforts from the Air Quality team to improve air quality in overburdened communities highly impacted by air quality, the coalition wishes to note that local and state governments, along with polluting entities, bear the bulk of the responsibility to reduce exposure to pollutants. The programs supported by the grants administered under this program will be of importance to the community and will help reduce exposure to air pollution. However, the Department of Ecology has been granted authority under the CCA (RCW 70A.65.020(2)) to target the greatest sources of criteria air pollutants in overburdened communities highly impacted by air pollution to ensure meaningful reductions to these pollutants.

Thank you for the opportunity to provide input on the development of this grant program. If there are any questions regarding the recommendations provided above, please contact me at davin@frontandcentered.org.

Sincerely,

A handwritten signature in black ink, consisting of a stylized first name and a last name, with a horizontal line extending to the right.

Davin Diaz
Environmental Justice Program Manager