



RECOMMENDATIONS ON IDENTIFYING FRONTLINE COMMUNITIES IN WASHINGTON STATE POLICY & PROGRAMS

WHAT ARE FRONTLINE COMMUNITIES?¹

Frontline Communities are those most impacted historically, currently, and in the future by climate/environmental impacts that should be prioritized for participatory decision making, harm prevention, and resource allocation. In CETA², HEAL³, and CCA⁴ frontline communities are defined using two terms of art:

Vulnerable Populations: *People*, irrespective of geography, that are more likely to be at higher risk for poor health outcomes in response to environmental harms due to shared characteristics that may be demographic (e.g. race/ethnicity), socio-economic (e.g. income/wealth, access to food and healthcare, linguistic isolation), health sensitivities (e.g. children), or work in common (e.g. farmworkers)

Overburdened or Highly Impacted Communities: Geographic *areas including Tribal lands* where vulnerable populations reside or work, and are exposed to combined and/or cumulative pollutants or contaminants.

THE SCOPE OF ACTION SHOULD DETERMINE THE APPROACH

There are different needs at the legislative / agency-wide level and the programmatic level in defining overburdened communities.

Legislative / Agency-Wide Identification: When used by the legislature or agency-wide, overburdened communities and vulnerable populations should be defined in a straightforward, consistent manner that is readily available to everyone without additional research. The definition must provide the ability to measure and track identifiable metrics in the aggregate. Using one common tool should result in a publicly available list of areas and populations, along with the underlying data used to classify the areas and communities as overburdened/highly impacted or vulnerable, respectively. Such a definition should also include a process for a community to petition or appeal for both inclusion and exclusion from the list. The Environmental Health Disparities (EHD) Map and Tribal Lands data provide the best foundation for this universal list.

Specific Program Identification: Programmatic identification should include the legislative/agency lists for the purposes of aggregate reporting, and go further in depth or specificity as appropriate to the vulnerabilities or exposures that can or are affected by the program. The identification should be responsive to both legislative, agency-wide, and program's objectives. The identification must not undercount the actual need of communities or artificially set the definition to comport with available resources. In addition to the agency-wide list of areas and populations, the agency should identify and publish program-specific lists of areas and populations for the program, that can be aggregated in one location statewide. The identification criteria and process should include qualitative data created with community, in addition to quantitative data. The process must provide a process to petition or appeal both inclusion and exclusion from the list.

¹ At Front and Centered, we favor “frontline communities” as a descriptor for communities of color, Indigenous peoples, and people with lower incomes who are hit first and worst by environmental damage and climate change. However, terms like Overburdened Communities and Vulnerable Populations are used in the law and therefore affect how policies impact our communities. It is therefore important to us that we present a definition of both Overburdened Communities and Vulnerable Populations so that we can talk clearly about how best to craft policy that serves our communities.

² Clean Energy Transformation Act, RCW 19.405.

³ Healthy Environment For All Act, RCW 70A.02.

⁴ Climate Commitment Act, RCW 70A.65.



THE TYPE OF ACTION SHOULD DETERMINE THE APPROACH

Frontline Communities should be identified relative to the application of the term in policy and programs. Three key uses to understand and appropriate uses are:

Precaution of Harm (e.g. Rulemaking and Program Implementation): When assessing a potential action, take a broad, precautionary approach to avoid unintentional consequences to frontline communities. This requires identifying communities that fall below the known harm threshold. For example, census tracts that are ranked as 7 or above on the EHD map are used for the Puget Sound Partnership Environmental Justice assessments, rather than a more narrow threshold of a 9 score on the EHD map.

Resource Prioritization (e.g. funding and budgets): When allocating resources that are limited, concentrate resources and benefits according to where they are needed most, while still identifying needs beyond those areas. In practice, this means identifying communities using a precautionary approach, and demonstrating how resources are concentrated to those with the greatest needs. For example, the WSDOT Connecting Communities program attempts to illustrate the full statewide need, and then prioritized projects for year 1⁵ based on resources allocated.

Tracking and Evaluating Progress: Relevant indicators and underlying data, with absolute rather than relative numbers, should be monitored to evaluate and measure improvements for communities that have been designated as Overburdened, Highly Impacted or populations designated as Vulnerable.

SPECIFIC RECOMMENDATIONS

Legislature / Agency Wide definition for Overburdened Communities:

Precaution of Harm use case: *Include areas Rank 7+ on the WA Environmental Health Disparities (EHD) Map or are Tribal Lands or are on White House CEQ Climate and Economic Justice Screening Tool (CEJST)*

Resource Prioritization use case: *Include areas that are Rank 9+ on the WA EHD Map or are Tribal lands*

Legislature / Agency-Wide definition for Vulnerable Populations: Include households or individuals at 80% of area median income or 200% below Federal Poverty Level (FPL), that identify as minority, that are members of a State recognized tribal community, and that have limited English proficiency, and that work outdoors or high exposure settings.

Programmatic definitions: Include the agency-wide/legislative definition as foundation, and layer additional tools, engagement, and additional research and engagement relative to the program/ subject matter to improve the match between the community interest with the program.

All uses must result in **publicly visible lists** made available in **one place, a petition/appeal for inclusion** and consistent **evaluations by communities**, and **public reports**. The identification process should **include transparent methods to update** the criteria and list with the **best available data** and migration patterns. The definition must also include **tracking and evaluation data** demonstrating how, over time, the factors affecting each community ranked have changed.⁶

⁵ [Sandy Williams Connecting Communities Program](#) Year One Project List

⁶ For more detailed recommendations, see Front and Centered's [HEAL Progress Report](#)