

## **Re: Front and Centered's comments on including the Climate Commitment Act in the Environmental Justice Council's workplan**

April 9, 2026

Dear Members of the Environmental Justice Council:

Thank you for the opportunity to provide input on the Council's workplan. The Council's workplan fails to consider the enormous implications that the Climate Commitment Act (CCA) has on frontline communities. It's imperative for the Council to prioritize focused oversight of key elements of the CCA, including defining and tracking meaningful benefits, engaging on linkage (with attention to local air quality, emissions outcomes, and revenue implications), assessing distributional impacts of program design (including provisions for EITEs), connecting investments to on-the-ground outcomes, and identifying implementation barriers and gaps. Giving the CCA dedicated attention will help ensure the Council is well-positioned to support equitable and effective implementation of Washington's climate policies and would facilitate more complete and timely consideration of environmental justice within the State's climate policy landscape.

### **Core to Washington's climate policy framework**

- The CCA is a primary mechanism through which the state is reducing emissions and funding climate investments. It plays a key role in shaping both environmental outcomes and how resources are distributed across communities.

### **Timely and consequential policy considerations (e.g., linkage, EITEs)**

- Ongoing and near-term considerations (including potential program linkage and provisions related to EITE industries) will influence program performance, state revenues, and the distribution of costs and benefits. These are important moments to consider environmental justice implications alongside implementation.

### **Impacts on frontline<sup>1</sup> communities**

- Core elements of the CCA (e.g., allowance allocation, cost containment, compliance pathways) affect how and where emissions reductions occur and how program costs are experienced. Considering these elements through an environmental justice lens can help ensure more equitable outcomes.<sup>2</sup>
- CCA-funded investments are closely tied to overall program performance. Revenue generation and market dynamics influence the scale and consistency of funding available to support frontline communities.

### **Supporting transparency and accountability**

- Including the CCA in the workplan can help strengthen understanding of how program outcomes align with statutory goals related to environmental justice, including the delivery of direct and meaningful benefits.

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<sup>1</sup>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.

<sup>2</sup> This is required under Wash. Rev. Code § 70A.65.040.

**Alignment with existing Council focus areas**

- The CCA intersects with issues already within the Council's scope. Including it in the workplan supports a more coordinated approach and understanding of how these issues are being shaped in practice.

**Value of early and ongoing engagement**

- Many aspects of the CCA are still being operationalized. Incorporating the CCA into the workplan allows the Council to provide input at points where it can meaningfully inform program outcomes, rather than reacting after decisions are finalized.

Including the CCA is necessary for the Council to fulfill its role in advancing equitable climate policy and ensuring that the benefits of Washington's climate investments reach those most impacted.

Thank you for your consideration and your continued leadership.

Sincerely,

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