

Environmental Justice Council Meeting Materials

November 18, 2022 Special Meeting

Table of Contents

Agenda - English	1
Continue Discussion and Potential Adoption of Recommendations to the Governor on CCA Funding Priorities.....	2
Memo	2
DRAFT: Proposed CCA Funding Priority Recommendations (updated 11/15/22)	3
Written Public Comments	12

Environmental Justice Council

Tuesday November 18, 2022

2:45pm – 4:00pm

Please click the link below to join the webinar:

<https://us02web.zoom.us/j/81373078942>

Or Telephone: +1 253 215 8782

Webinar ID: 813 7307 8942

International numbers available: <https://us02web.zoom.us/j/81373078942>

Draft Agenda

2:45pm – 2:50pm	I. Welcome and Roll Call	Tevin Medley, Facilitator Council Members
2:50pm – 3:00pm	II. Public Comment	
3:00pm – 3:55pm	III. Continue Discussion from 11/15/22 Special Meeting and Potential Adoption of Recommendations to the Governor on Climate Commitment Act (CCA) Funding Priorities -Possible Council Action	Tevin Medley Council Members
3:55pm – 4:00pm	IV. Next Steps and Farewell	Tevin Medley Council Members

Important Information:

- The Council may move agenda items around on the day of the meeting.
- Emergency contact number during the meeting is 360-584-4398.
- To request this document in an alternate format or a different language, please contact Sierra Rotakhina in any language, at envjustice@ejc.wa.gov or 360-584-4398.

Environmental Justice Council

Date: November 18, 2022

To: Environmental Justice Council Members

From: Sierra Rotakhina, Council Manager

Subject: Climate Commitment Act Funding Priorities

Background and Summary:

The Environmental Justice Council (Council) held a special meeting on November 15, 2022 to discuss its Climate Commitment Act funding recommendations for the Governor. The Council did not adopt the proposed recommendations at that meeting. The Council is meeting again today to continue this discussion and potentially adopt recommendations.

At this meeting the Council will be focusing on the portions of the recommendations that the Members did **not** discuss at the November 15th meeting—specifically the last section of the recommendations under the header: “Recommendations for the Governor’s Operating Budget.” You can find more details on the November 15th meeting here: [November 15 2022 EJ Council Meeting Packet\(2\).pdf \(waportal.org\)](#). The meeting recording is posted here: [Environmental Justice Council: Special Meeting - Zoom](#). The Council may also choose to discuss public comments provided at the November 15th meeting and at today’s meeting as well as the written public comments the Council has received. Comment letters are available on page 12 through 17 of today’s meeting packet.

Staff Recommended Actions:

Staff recommend that the Council discuss, amend if necessary, and adopt the following motion:

The Council adopts the Climate Commitment Act funding priority recommendations as amended at the November 18, 2022 Council meeting, and directs staff to submit those recommendations to the Governor and the Office of Financial Management to inform the development of the Governor’s 2023-2025 Budget.

Staff Contact

Sierra Rotakhina, Council Manager, sierra.rotakhina@ejc.wa.gov, 360-584-4398

Environmental Justice Council

Proposed Climate Commitment Act (CCA) & Governor's Budget Priorities as of 11-17-22

It is the intent of the Environmental Justice Council (Council) that the below topics are prioritized, even if the funding does not come from the respective account under which the priority is listed.

General Recommendations:

- State agencies that allocate funding or administer grant programs using revenue generated by the CCA should go through the Tribal Consultation process outlined in [RCW 70A.65.305](#), regardless of the account.
- The State budget must reflect the legal mandates under RCW 70A.65.230 and provide transparency in meeting those mandates by providing “direct and meaningful benefit to overburdened communities and vulnerable populations.” The funding must be focused and meaningfully targeted to overburdened communities and vulnerable populations and impacts tracked by implementing agencies, guided by a detailed description of the “direct and meaningful benefit” and “the populations/communities benefiting” as a direct result of the proposed investments. The Council will work with the Governor and the Legislature to better define these terms and how best to ensure accountability of investments.
- The Legislature, Governor's Office, and state agencies (in partnership with the Council) should monitor where CCA funds are going and any potential unintended consequences^{i,ii} of the funding, and provide quarterly updates to the Council. The Council also recommends that the Legislature, Governor's Office, and state agencies work in collaboration with the Council to make adjustments if the Cap and Invest Program or the funding streams create unintended consequences or are not meeting the minimum percentages.
- The Council recommends that the state conduct systems level mapping (see glossary below) and studies, as needed, to plan for and mitigate potential unintended consequences (including but not limited to green gentrification, negative impacts of siting of clean energy infrastructure, etc.), and allocate funds to this purpose.

- The Governor’s Office, the Legislature, and state agencies should continue to work closely with the Council during and after the 2023 legislative session to ensure that a minimum of 45% of CCA funds to go to overburdened communities and a minimum of 20% of CCA funds to go to Tribes.ⁱⁱⁱ
- State agencies must ensure that grant processes are structured in a way that they do not replicate inequitable practices and procedures.^{iv} State agencies should monitor any CCA-funded grants over time and apply equity-analyses to determine if there are patterns that indicate inequitable outcomes and update the Council on their findings.
- Ensure the eligible entities for CCA-funded programs and/or grants include but are not limited to non-profits, churches, small businesses, government, etc.
- The Governor’s Office, the Legislature, and state agencies should continue to work with the Council where the Council has authority to provide guidance on prioritization of CCA revenues as outlined in Appendix A.

Account-Specific Recommendations:

1. Carbon Emissions Reduction Account

- i. The majority of funds should support frequent accessible public transportation services that is statewide, convenient, zero emission, reduces health disparities, and improves health by physically connecting overburdened and vulnerable communities to social determinants/resources such as housing, education, jobs and job training, food systems, health and human services, early childhood development, parks and natural resources, community economic development, and community and public safety. Reduce impact to local businesses in building of this type of transit and do not break up stable neighborhoods or create unsafe conditions while building the infrastructure. Support education on carbon emission reduction programs to ensure individuals are aware of the availability of transportation services and any incentives.
- ii. Fund an incentive program and technical assistance and support for conversion of heavy and medium duty vehicles from gas to zero emission in overburdened communities.^v Ensuring that the additional costs of these vehicles do not flow to the largely immigrant workforce of misclassified independent contractor drivers.
- iii. Fund an incentive program and technical assistance and support for conversion to zero emissions vehicles for those who are using a primary vehicle for small business write-offs.

2. Climate Commitment Account (CCA)

- i. Prioritize and quickly expedite Tribal assistance for addressing impacts of climate change, the pollutants impacting Tribal communities and the human and natural resources of Tribes with funding at the minimum of \$50M per biennium.
- ii. Community Participatory Climate and Environmental Justice Planning:
 - a. Set aside funds with generalized guidelines on how they can be spent (that do not exceed the restrictions already in the CCA) to develop a community participatory budgeting process that centers racial, social, and economic equity (see glossary below).^{vi} Allocate additional funds to:
 - a) build community capacity for participation in planning and budgeting, b) adequately resource the development and administration of a participatory budgeting process, and 3) to ensure the participatory process includes resources that minimize barriers to participation (including but not limited to funds for interpretation and translation, community member stipends, food, childcare or adult care costs, and travel expenses).
 - b. Funding for the program should build a partnership with applicable agencies to work with the Council to develop the timeline and process for the community participatory budgeting program and adequately resource the Council to partner in this work.
- iii. Support potential expansions of Working Families Tax Credit
- iv. Community and Worker Climate Resilience
 - a. Develop a grant program for communities to co-design and develop regional urban and rural Community Climate Resiliency Hubs (see glossary below).
 - b. Provide worker climate health protections, including: 1) Protective/safety clothing and equipment for climate health threats to impacted community members including, but not limited to, farmworkers, food system workers, forest firefighters, and construction workers and 2) payroll replacement to support worker lost wages due to climate health threats like heat, smoke, and rising waters.
 - c. Provide community members highly impacted by climate change (including those who are experiencing houselessness or living in temporary housing) with funding for mitigation, adaptation, and relocation.

- d. Develop an insurance pool or similar permanent financial fund such as a mortgage pool that provide immediate temporary housing and make it possible for people to get back into their own home following loses resulting from climate change.

v. Energy Justice Fund

- a. Full funding for low-income “home weatherization plus health plus clean electrification,” including home repair as necessary, including community scale weatherization being piloted by the Department of Commerce.
- b. Funding to prevent utility disconnection for lower income cost burdened households and to ensure lower income households spend no more than 3% of household income on utilities
- c. Fund a study on the short- and long-term sustainability of Washington electrical production to meet increased demand towards 100% goal for clean home and business energy given removal of dams and make recommendations which include complimentary clean energy resources such as solar. The study must engage Tribal leadership.

vi. Food systems/agroecology & green infrastructure identification and implementation funding

v. Workforce

- a. Full funding for a Clean Energy Workforce Study.
- b. Full funding for creating a Statewide Building Trades Apprenticeship Navigation Program for Vulnerable Populations and Overburdened Communities.
- c. Funding for Nontraditional & extended hour Childcare for the construction industry.
- d. Support a transition to retirement for workers impacted by the transition to clean energy at the end of their careers so that instead of training them for green jobs as they near retirement they get support to transition into retirement.
- e. Fund workforce development and training to expand workforce capacity and knowledge needed to develop green stormwater infrastructure used to reduce water temperatures.

3. Air Quality and Health Disparities Improvement Account (AQHDIA)

- i. Air Quality and Health Disparities Improvement Account be increased to a minimum of \$50 M per biennium.

- ii. Implement a community driven approach to air quality grants that reflects the priorities of vulnerable populations and builds capacity to advocate for their needs.
- iii. Fully fund air quality monitoring network in in the 2023-25 biennium that provides a block-by-block understanding of air quality impacts facing rural and urban communities statewide.
- iv. Assure that Regional Air Quality Authorities are complying with the State’s Air Quality Initiative, regulations and implementation for Overburdened Communities and Vulnerable Populations.

4. Natural Climate Solutions Account

- i. Equitable urban tree canopy investments
 - a. Funding for coordination of capital projects and roadway construction projects that help fund the cost associated with utility relocation so that trees can be planted on otherwise restricted planting strips.
 - b. Support of local governments development of a full funded tree maintenance program.
 - c. Funding for increasing the size of planting strips and without impact to parking and sidewalk reduction.
- ii. Address threat to community rising seas/rivers/water, drought, and lack of potable water.
- iii. Identify green infrastructure and implementation.
- iv. Protect and restore natural resources that contribute to the diet and health and medicine of overburdened communities, or order to assure the continued exercise of tribal treaty rights.
 - a. Protect, restore, and maintain riparian habitat.
 - b. Protect and restore estuaries, fisheries, and marine shoreline habitats.
 - c. Prepare for sea level rise including, but not limited to, making fish passage correction investments, looking specifically into dams and structures that increase water temperature.
 - d. Increase the ability to remediate and adapt to the impacts of ocean acidification.
 - e. Increase the sustainable supply of water and improve aquatic habitat.
 - f. Increase raingardens and stormwater treatment facilities that keep waters cool during treatment before entering into large bodies of water (e.g., outfalls) during the hotter months.

Recommendations for the Governor’s Operating Budget

- Fund Department of Health Tribal pre-Consultation activities and statutory-required Consultation on the Environmental Health Disparities (EHD) Map. The Department of Health must offer Tribal Consultation and the EHD map shall be updated with Tribal input provided. This is essential as the current EHD map does not include tribal data (e.g., air quality monitoring) or priorities (e.g., water quality). The EHD map should not be used to make funding decisions prior to the completion of this statutory-required consultation with tribal governments and associated updates to the map.
- Fund the Department of Social and Health Services request for Community Assemblies that support community capacity to identify and advocate for their needs.

Glossary of Terms:

1. **Community Participatory Budgeting:** A democratic process where community members decide how to spend allocated public funding.
2. **Community Climate Resiliency Hubs:** Community centers, schools, libraries, churches, etc. that are easily accessible to community members that meet the climate-resilience needs identified by the community. A hub could, for example, include smoke relief centers, heating and cooling centers, evacuation shelters, etc.
3. **Systems Level Mapping:** Diagrams that map out how various systems are interconnected to demonstrate and explore the potential pathways for how a policy or funding decision can have impacts in areas that may at fist seem unrelated.

ⁱ “Green gentrification,” the influx of wealthier new residents to previously low-income neighborhoods following greening initiatives and investments in those neighborhoods, has been documented in cities all over the world, including in the U.S. Green gentrification can drive up housing costs and displace low-income residents, especially renters. Research shows that green gentrification has complex interactions with human health and health equity. See Jelks NO, Jennings V, Rigolon A. Green Gentrification and Health: A Scoping Review. *International Journal of Environmental Research and Public Health*. 2021; 18(3):907.

ⁱⁱ Resources needed for clean energy, such as mining of lithium for batteries and citing for wind and solar projects, runs the risk of impacting the sovereignty, health, and cultural resources of Indigenous people. For example, the Paiute and Shoshone Tribes have vocally opposed the Thacker Pass lithium mine in Nevada due to concerns about the risk to air and water quality, access to traditional foods and medicines, and the likely impacts to sacred sites. See Native News Online. *Voices From the Tribes: Paiute, Shoshone Elders’ Perspectives on Nevada Lithium Mine Proposal*. Available from <https://nativenewsonline.net/currents/voices-from-the-tribes-paiute-shoshone-elders-perspectives-on-the-nevada-lithium-mine-proposal#:~:text=For%20centuries%2C%20the%20area%20has%20been%20used%20by,Pass%20holds%20an%20important%20history%20for%20the%20tribe>. 2021.

ⁱⁱⁱ The Council believes that these higher percentage goals are feasible given data from California showing that, conservatively, 48% the California Cap and Trade Program auction proceeds have consistently been distributed to "disadvantaged communities and low-income communities and households, collectively referred to as priority populations." See California Climate Investments. What are Priority Populations. Available at <https://www.caclimateinvestments.ca.gov/priority-populations>. Accessed November 11, 2022.

^{iv} Grant programs often inequitably distribute grant funds with funds never reaching the communities that most need the resources. As one example, a recent analysis of Washington State Recreation and Conservation Office grants identified several equity issues such as grants skewing toward places with pre-existing parks and conservation land, underinvestment in Black, Indigenous and Communities of Color by most grant programs, and a lack of granting to areas with low park and green space acreage. The report also includes recommendations to address these granting inequities. Prevention Institute. *Equitable Grantmaking: A Comprehensive Review of Washington State Recreation and Conservation Office Grant Programs*. Available at https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=Final%20RCO%20grants%20equity%20review%20proviso%20report_0e194323-eb36-4a9f-ba0b-881d9602636a.pdf. 2022.

^v For example, communities near Washington's ports experience high concentrations of air pollutants leading to environmental and health disparities. See Northwest Ports Clean Air Strategy 2020 Progress Report at page 15. [NWPCAS 2020 Progress Report-FINAL.pdf \(portseattle.org\)](#). 2021.

^{vi} Many local jurisdictions, including those in Washington State, have successfully allocated funds through community participatory funding. Jurisdictions in Washington such as Seattle and Tacoma are currently working to allocate millions of dollars through participatory budgeting. These processes ensure projects are relevant and informed by community needs and priorities. See, for example, National Association of County and City Health Officials. Innovation Snapshots #4: Participatory Budgeting. [Innovation-Snapshot-4-Budgeting.pdf \(naccho.org\)](#). 2021; Seattle Office of Civil Rights webpage. Seattle's Participatory Budgeting Process. Available at [Seattle's Participatory Budgeting Process - CivilRights | seattle.gov](#). Accessed November 11, 2022.

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Climate Commitment Act Auction Revenues - Accounts

Carbon Emissions Reduction Account (CERA)			Climate Investment Account (CIA)			Air Quality and Health Disparities Improvement Account (AQHDIA)
CERA funds largely allocated already through Move Ahead Washington (transportation budget) and will go out through 1) formula directly to eligible recipients, 2) competitive grant programs, and 3) “earmarked” funding to go to projects listed out by the Legislature						
20% stays in CERA	24% to Climate Active Transportation Account	56% to Climate Transit Programs Account	Administrative costs and Tribal capacity grants	75% of remaining funds to Climate Commitment Account	25% of remaining funds to Natural Climate Solutions Account	Funding intent in statute is \$20M/biennium
<p>Mechanisms for Council Input: Now: Guidance to the Governor’s Office and OFM by November 15, 2022 on what programs to prioritize funding with the a) State and Local De-Carbonization Projects and b) Carbon Emissions Reduction Local Grants. The annual amount for the State and Local De-Carbonization Projects is about \$24.5 million and the annual amount for the Carbon Emissions Reduction Grants is \$7.8 million (still verifying amounts with OFM)</p> <p>During Session: Guidance to Legislature throughout 2023 session to inform House, Senate, and final budget</p> <p>After Session: Guidance to agencies and Governor’s Office after 2023 session on the grant programs funded during session</p> <p>After Session: Guidance to WSDOT on the Move Ahead Washington ferry electrification and passenger rail investments, engagement would begin in 2023 and continue over time as needed</p>	<p>Mechanisms for Council Input (see WSDOT memo): Now: Guidance to WSDOT on transit and active transportation proposed projects lists to fund (lists due from WSDOT to Legislature by December 1, 2022)</p> <p>During Session: Guidance to Legislature throughout 2023 session as they make final decisions on transit and active transportation investments for the 2023-25 biennium</p> <p>After Session: Guidance to agencies and Governor’s Office after 2023 session on any grant or formula programs funded during session</p> <p>After Session: Guidance to WSDOT in Summer/Fall of 2023 on how to improve transit and active transportation programs (then regular guidance each biennium)</p>		<p>Notes: A max of 5% can be used to administer the Cap and Invest Program</p> <p>Tribal capacity grants are also funded before the remaining funds are allocated</p>	<p>Mechanisms for Council Input: Now: Guidance to Governor’s Office and OFM by November 15, 2022 to inform Governor’s budget</p> <p>During Session: Guidance to Legislature throughout 2023 session to inform House, Senate, and final budget</p> <p>After Session: Guidance to agencies and Governor’s Office after 2023 session on any grant programs funded during session</p>	<p>Mechanisms for Council Input: Now: Guidance to Governor’s Office and OFM by November 15 to inform Governor’s budget</p> <p>During Session: Guidance to Legislature throughout 2023 session to inform House, Senate, and final budget</p> <p>After Session: Guidance to agencies and Governor’s Office after 2023 session on any grant programs funded during session</p>	

Written Public Comments

From: Mary Jean Ryan

Sent: Tuesday, November 15, 2022 9:22 AM

To: DOH EPH OEPHS Environmental Justice <envjustice@ejc.wa.gov>

Cc:

Subject: Public Comments for EJC Meeting Today

External Email

Good morning—

My name is Mary Jean Ryan. I live in Quilcene, WA. I am a volunteer activist working on forest conservation and rural community health. My specific conservation focus is on State managed forests. Given the climate crisis and the role that older forests play in climate protection, we are working to get the State DNR to stop clearcutting the remaining older, structurally complex forests that are among the best in the world in terms of carbon storage and sequestration. We are also interested in expanding forest cover and healthy forests in and near overburdened communities.

I am sorry I cannot be there in person today for your meeting. I applaud the work you are doing. It is a very exciting opportunity to make significant progress toward the State's climate goals and to address the needs and opportunities in overburdened communities- both urban and rural. The CCA language as relates to the NCS Account lists out a number of eligible uses which include healthy forest investments, preventing emissions by preserving natural and working lands from the threat of conversion or loss of critical habitat, creation of new conservation lands etc etc I see a number of ways that the NCS Account could advance these objectives and look forward to further discussions with you about these emerging ideas.

I respectfully request that you consider adding to your NCS Account list of recommendations:

Increase climate and habitat protection by protecting and restoring older, carbon dense forests managed by the State of Washington

Increase climate protection by expanding healthy forests in and near overburdened communities- urban and rural

Thank so much for your consideration and for all your work!

Sincerely,

Mary Jean Ryan

Volunteer with the Washington State Lands Working Group

Volunteer with the Center for Responsible Forestry

From: Shaun Glaze
Sent: Tuesday, November 15, 2022 11:59 AM
To: DOH EPH OEPHS Environmental Justice <envjustice@ejc.wa.gov>
Cc: Patricia Davis
Subject: Public Comment for EJC PLUS action requested for Community Reinvestment Plan

External Email

Hi EJC,

Thanks for today's meeting! I'm working on projects that have been meeting with community members about their priorities, as it pertains to your council. **(please see bolded text below for a requested action)** There are a few comments I want to surface for your team:

1. For economic development, we're hearing that many community members are interested in making sure that skills people learn in forestry and fighting fires to be translated into strong career pathways upon release from incarceration. This includes having priority hire in decisions in their local conservation and fire responder work in community settings.
2. We're hearing many people speak to violence prevention and intervention programs that are focused on environmental justice. This includes youth programming that is outdoors or that reconnections communities with their relationships with nature in green spaces and farming applications.
3. We're hearing concerns about the built environment and Black, Indigenous, and Latinx communities not having enough access to green spaces - or that there aren't parks or places added to community until gentrification is already underway, people want to see more investment before that happens and for there to be support in cleaning up the pollution that is affecting their lives.
4. We're hearing about the importance of there being robust support for green jobs that explicitly position Black, Indigenous, and Latinx communities an opportunity to work as workers or start their own businesses in this space. I've heard concerns that "green jobs" will come to be a way of saying "white jobs", which is unfortunate and avoidable - since everyone can be a part of creating a green economy. We're hearing there need to be earmarked and set-asides that explicitly recruit for these communities in order for people to feel empowered to apply. We need to see a budget that is explicit about funding for programs that increase worker and supplier diversity.
5. Communities are adamant about there being more support for transportation infrastructure that has an environmental and racial justice lens. This means that there need to be programs that are explicit about how to reconnect communities that were intentionally harmed by transportation infrastructure - which is consistent with what's happening at the federal level. WA can be more of a leader here by being specific about addressing harm caused by previous transportation investments.
6. Reentry groups are interested in being a partner in helping folks get more green jobs, but need more support from the State on how to do that - a central website that interfaces with reentry-specific considerations would go a long way.

I'd love to invite all of you, as well, to participate in the WA Community Reinvestment plan (<http://WA-Reinvest.com>). It's going to reinvest \$200M into the community to address the harms caused by the War On Drugs. We've been meeting with stakeholders such as yourselves and community members directly through virtual and in-person meetings, phone calls, text messages, and our website.

Action requested: Please, will you consider answering our survey on our website? <https://wa-reinvest.com/> or [filling out this text-based questionnaire](#).

COMMERCE hired a consulting group (Harriet Tubman Foundation For Safe Passage) to develop a plan and engage in consultation and facilitation, stakeholder engagement and empowerment, and primary and secondary research and analysis. At a minimum, the plan must address how the community reinvestment account funding will:

- Produce significant long-term economic benefits
- Not require continuing state support
- Not supplant private investment
- Accompany additional public or private investment
- Prioritize nonprofit, faith-based, and grassroots organizations for funding

Happy to connect with your office more directly about our project – wanted to offer what we’ve heard to help you with the next steps you’re intending to take as the budget gets more finalized.

Shaun

Shaun Glaze (they/them)

From: john worthington

Sent: Wednesday, November 16, 2022 9:52 AM

To: DOH EPH OEPHS Environmental Justice <envjustice@ejc.wa.gov>

Subject: Universal climate change equity comments

External Email

Hello,

I am John Worthington from Sequim and a former resident of Port Angeles who is downwind from Port Angeles.

Because Worthington alleged violations of laws during the administrative process and is near to and very well may be a resident of Port Angeles in the future, Worthington claims standing to challenge the Climate Resiliency Implementation Plan and the Port Angeles Comprehensive plan. Worthington also alleges he has participation standing because it is a matter of record that he testified against the use of “clear path” and Cascadia Group because they were going to pursue a “flubber and magic bean formula.”. Worthington also alleges organizational standing having reserved the organization “Save PA” with the Washington State Secretary of State’s office.

Worthington opposes the adoption of agenda item I. 1 as shown below:

I. Other Considerations 1. Climate Resiliency Implementation Plan Adopt..... I-1

Worthington opposes all Washington State climate change, equity and growth management plans.

General opposition summary:

Clear Path does not achieve a proper climate resiliency because:

1. Clear Path and Cascadia Group did not properly track the international shipping and trucking GHG Inventory of Port Angeles. It is estimated that Port Angeles obtains over 72 percent of its agriculture and manufacturing from as far as 8,000 miles away from the “World Economy.” The emission from this international process is a measurable amount which far exceeds the local and regional emissions which is the only process tracked during the scoping process. The “world economy” process does not come close to proportionately paying user fees to discourage use in the same fashion as local and regional process. In fact, World economy emissions is completely exempt from any emissions accountability under any comprehensive plan or addendums to those plans including the City of Port Angeles despite the fact those emissions far and away exceed those of the local and regional process. The Port Angeles Climate Resiliency Implementation Plan does nothing to mitigate the “world economy” emissions which are now at catastrophic levels. Due to the prevailing gulf stream Worthington is negatively affected by the Port Angeles Climate Resiliency Implementation Plan and Port Angeles comprehensive plan. The EPA requires extensive indirect 3 scoping

(Emissions from outside sources) by industrial processes who's indirect GHG inventory from outside sources makes up the majority of the GHG inventory. In this case, that is the "world economy" shipping. If Port Angeles was an industry being held to proper GHG scoping standards, the current climate resiliency plan would not be passable in its current form. Furthermore, the plan does not "centralize economic activity." It never will. It will always be a tool to create more capacity for third world countries.

2. The public has not observed the total thought process used by Cascadia Group nor have they viewed any referenced or unreferenced materials sent to ICLEI and then forwarded to Cascadia Group via circulars and webinars found. They have also not viewed any immigration policy statements. (Being better neighbors being better connected" encourage foreign investment.) Worthington was required to seek information from elsewhere which illustrated a clear preference for the ICLEI and the "world economy" to "build capacity' for third world countries. This is found in the initial agenda 21, and the following local agenda 21 to which ICLEI supported. Local agenda 21 clearly states it is a form of equity to allow "transfer of power to people of color." This is discrimination.

3. The City of Port Angeles violated state and federal treason laws and the delegation doctrine by letting an International sphere of government and its agent Cascadia Group to take over the Comprehensive plan by letting them have access the Port Angeles ICLEI member login to conduct the business of the people. The "delegation doctrine" prohibits delegation of legislative authority to a Non legislative branch of government. See WASH. CONST. art. II, § 1; Sackett v. Santilli, 146 Wn.2d 498, 504, 47 P.3d 948 (2002). With that illegal delegation, Cascadia Group effectively shielded the international, equity and immigration or other policy influence from the view of those persons like Worthington from watching an open process to track the process of the development of the Comprehensive plan and any addendums. The City Council has no idea what it is they are adopting. They have not properly reviewed the ICLEI Charter, bylaws or any previous documentation ICLEI has released. The City Attorney has not viewed these documents and the City of Port Angeles is blind to the pronounced ulterior motives of ICLEI, C40 and the other special interest groups whose policy desires float about in the ICLEI circulars and webinars. Port Angeles has been effectively hijacked by the international contracts favorable to the "world economy" and the catastrophic amounts of emissions it creates. The City Attorney has also not viewed any documents to transfer power to people of color. The plan clearly lists a transfer of power to tribes and other groups of color with stated goals to use a false equity narrative that overstates the harm to people of color while they simultaneously plot to transfer power to them. The emissions from the 'world economy" found in the prevailing jet stream has absolutely no chance to disproportionately effect people of color over white people. This is just a lie used to justify transferring power to people of color and to improperly focus on American process to punish America for the benefit of the "world economy" under the guise of climate change while creating a growing and catastrophic climate emergency caused by International shipping.

4. The Port Angeles Planning Commission has admitted they did not consider the emissions from the "world economy" and at least one member incorrectly stated that the clear path was not "political" without knowing what Cascadia used through ICLEI to obtain its GHG Inventory and why. After making these statements the member openly stated the emissions from all sources should be tracked. For that reason alone, the plan should be rejected. The rest of the committee focuses on a tree canopy rather than any emissions from a "world economy" restoring a tree canopy to a time when fewer people lived here is a dead giveaway to the stated goal of Agenda 21 to reduce human population. The commission wants tribal and special interest

control. The commission wants to let tribes restore the natural balance while using modern technology to harvest that old natural process without reducing the shortie catches or using technology to store stormwater to alleviate summer drought and water restrictions. Man has been a natural part of the world too. His technology can make up for its existence if given a chance. . The commission has not suggested anything to save all races from the emissions of the “world economy” nor have they attempted to consider any cap-and-trade formula involving local and regional agriculture and manufacturing to reduce the catastrophic levels of emissions from the world economy. The growth management plan is bereft of local agriculture and manufacturing goals. Its main goal is to ordinance control over the city center to obtain a transfer of power to the tribes, push transit service agency bumps and urban population increases.

5. The plan violates RCW [47.80.026](#) because it does not "concentrate economic activity." The plan continues the trend of hampering local and regional process while forcing that activity to the "world economy" who does not face local and regional environmental scrutiny. Since the ICLEI and "local agenda 21" have been initiated in 1991, the "world economy" emissions has exploded to catastrophic levels.

Comprehensive plans, transportation guidelines, and principles.

Each regional transportation planning organization, with cooperation from component cities, towns, and counties, shall establish guidelines and principles by July 1, 1995, that provide specific direction for the development and evaluation of the transportation elements of comprehensive plans, where such plans exist, and to assure that state, regional, and local goals for the development of transportation systems are met. These guidelines and principles shall address at a minimum the relationship between transportation systems and the following factors: **Concentration of economic activity**, residential density, development corridors and urban design that, where appropriate, supports high capacity transit, freight transportation and port access, development patterns that promote pedestrian and nonmotorized transportation, circulation systems, access to regional systems, effective and efficient highway systems, the ability of transportation facilities and programs to retain existing and attract new jobs and private investment and to accommodate growth in demand, transportation demand management, joint and mixed use developments, present and future railroad right-of-way corridor utilization, and intermodal connections.

Examples shall be published by the organization to assist local governments in interpreting and explaining the requirements of this section.

6. The building and fleet suggestions are the only sections worth retention.

Thanks

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