



## **RECOMMENDATIONS ON DEFINING DIRECT AND MEANINGFUL BENEFITS IN WASHINGTON STATE POLICY & PROGRAMS**

### **SUMMARY**

Front and Centered recommends the use of the below “community health indicators” to measure whether CCA funding allocations have led to “direct and meaningful benefits,” as required by statute. Direct benefits are those that meet communities’ self-identified needs through self-proposed solutions. In the case of CCA funding allocations, meaningful benefits are the reduction of greenhouse gas emissions and improvement of environmental health outcomes in Vulnerable Populations within Overburdened Communities.

### **REPORTING REQUIREMENTS**

The Climate Commitment Act (CCA) requires Ecology to report to the Legislature annually on spending from CCA accounts.<sup>1</sup> The 2023 Operating Budget<sup>2</sup> clarified that, starting in 2024, the report must also include information related to spending on all projects that benefit vulnerable populations in overburdened communities and/or are formally supported by Tribal resolution.

Funds spent from CCA accounts must be allocated such that 35%, with a goal of 40%, of the total funds provide “direct and meaningful benefits to vulnerable populations within the boundaries of overburdened communities.” RCW 70A.65.030(1). “**Direct and meaningful benefits**” are undefined by statute, though RCW 70A.65.030(1) clarifies that such benefits are achieved through:

- the direct reduction of environmental burdens in overburdened communities;
- the reduction of disproportionate, cumulative risk from environmental burdens, including those associated with climate change;
- the support of community led project development, planning, and participation costs; or
- meeting a community need identified by the community that is consistent with the intent of Chapter 70A.65 RCW or RCW 70A.02.010.

Given the lack of statutory clarity<sup>3</sup> Front and Centered seeks to provide a workable, applicable definition for “direct and meaningful benefits” for the purposes of ensuring that CCA funds are distributed in the most equitable and efficacious manner possible.

### **Direct: COMMUNITY DIRECTED INVESTMENTS**

In order to be considered to provide a “direct” benefit, the program, service, or fund should meet a community benefit identified through community participatory decision-making and community capacity. Thus, direct benefits are those that meet communities’ self-identified needs through self-proposed solutions. In practice, agencies must

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<sup>1</sup> RCW 70A.65.300,

<sup>2</sup> Laws of 2023, ch. 475, § 302(13)(a).

<sup>3</sup> For more information on the terms “overburdened communities” and “vulnerable populations,” see Front and Centered’s blog post, [“Now That Frontline Communities Have the Government’s Attention, How Will They Be Defined?”](#)



engage in an ongoing process of soliciting and listening to communities on their priorities. The process should ensure:

- Enhancement of Grassroots Participatory Democracy
  - Representation in decision-making processes that reflects the diversity of the population, including frontline communities and youth, like Participatory Budgeting and Community Assemblies, suggesting a more inclusive democracy.
- Creation of practices and structures that enable equitable governance
  - People have an opportunity to participate in decisions about activities that may affect their environment and/or health
    - Information is timely, written in a way that is accessible to the average person, distributed specifically in areas that would be impacted by a decision, and translated into languages other than English most commonly spoken in the impacted area
  - Public contributions can influence regulatory agency decisions
  - Community concerns will be considered in the decision making process
  - Decision-makers will seek out and facilitate the involvement of those potentially affected.

**In short, “direct benefits” derive from programs, funds and services that:**

- **Have positive environmental, social and/or economic effects on members of Vulnerable Populations within the geographic boundaries of an Overburdened Community;**
- **Specifically target vulnerable populations within Overburdened Communities; and**
- **Are identified in conjunction with the targeted communities.**

Beyond the specific “earmarked” funds meant to target vulnerable populations in overburdened communities, agencies should strive for *all* funds allocated from CCA revenues to, in some way, benefit Overburdened Communities, as these communities face the greatest barriers to environmental benefits and the most impact from environmental harm strategies.

“Flow-down” funding (i.e., directing funding to non-overburdened communities to provide benefits to overburdened communities, such as funding to prevent or reduce upstream or upwind pollution), while beneficial, should be considered to be part of the 60% of non-earmarked funds. Alternatively, funding for agency staffing should count towards a “direct” benefit, since staffing is needed to make many of the necessary programs or projects function. This is particularly true while agencies seek to bring on new staff to meet new environmental justice-related statutory requirements. However, whether staffing funding should be considered a “direct” benefit after this initial phase should be reassessed in the future.

### **Meaningful: ELIMINATING ENVIRONMENTAL HEALTH DISPARITIES AND GREENHOUSE GASSES**

A benefit should be considered “meaningful” if it achieves measurable progress towards a stated objective, e.g., it advances a relevant legislative intent. In the case of the CCA, a project, program, or grant provides a meaningful benefit when it reduces greenhouse gas emissions or improves environmental health for Vulnerable Populations within Overburdened Communities. Further, meaningful benefits are those that do not replicate or replace other pre-existing non-CCA state- or privately- funded efforts, but rather, work independently or in concert with those programs. To determine what benefits result from CCA funds, agencies must include a description of the project

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and both a projection (pre-project) and assessment (during and post-project) of the project's impacts on a publicly accessible dashboard hosted by the state Office of Financial Management. The project assessment must demonstrate the project's estimated ability to eliminate environmental health disparities and reduce greenhouse gasses in Overburdened Communities.

The information reported on the dashboard should confirm that the investments resulted in meaningful benefits. As such, the indicators proposed below are what Front and Centered believes reflect meaningful values and should be used as the basis for what is reported in allocating funding for projects and programs using CCA funds. These indicators must be tracked to assess the long-term effects of projects deemed to have direct and meaningful benefits to Vulnerable Populations in Overburdened Communities.

## **ENVIRONMENTAL & COMMUNITY HEALTH INDICATORS**

The allocation of CCA funds to directly and meaningfully benefit Vulnerable Populations within Overburdened Communities should be measured by a number of Environmental and Community Health Indicators. While not all indicators will be relevant, every program, project, or grant receiving CCA funding should meet at least 1 of the following indicators. Programs, projects, or grants should strive to be responsive to more. The recommended indicators, and some potential metrics, follow.<sup>4</sup> Ultimately, a full list of indicators and metrics should be developed through a collaborative effort between the responsible state agencies and the Environmental Justice Council.

- Environmental Exposure
  - Air Quality: Reducing levels of greenhouse gasses, criteria air pollutants, and hazardous air pollutants
    - Possible metrics: criteria air pollutant levels (PM2.5, PM10, SO2, NOx, Pb, CO2, O3), Ozone concentration, Diesel exhaust PM2.5 emissions, cancer risk from air toxics excluding diesel PM, non-cancer risk from air toxics, quantity of hazardous air pollutants, toxic releases from facilities into air, proximity to heavy traffic roadways, levels of noise pollution
  - Water Quality: Reduction of contamination levels of water sources, including drinking water and bodies of water
    - Possible metrics: drinking water quality, marine water quality, number of fish and shellfish health advisories, wastewater discharge levels, surface water quality, groundwater quality, number of combined sewer overflows
  - Exposure to Toxins: Limit proximity to sources of pollution such as industrial facilities, hazardous waste sites, and transportation corridors.
    - Possible metrics: number of railways, airports, or ports in community; housing stock with lead risk; leaded fuel use; density of or proximity to known contaminated sites and clean-up sites, progress of clean-up for contaminated sites.
  - Climate Resiliency: Increase community ability to adapt to climate change-related hazards and leverage opportunity to transform communities through inclusive efforts that reinforce existing social structures and community cohesion

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<sup>4</sup> The following indicators are inspired by prior Front and Centered reports "[Accelerating a Just Transition in Washington State: Climate Justice Strategies from the Frontlines](#)" and "[Community Report on Environmental Justice](#)."



- Possible metrics: energy burden by household, average excess energy burden per household, number of resiliency hubs and zones within community, number of communities able to respond to climate change-related hazards, number of residents who have access to emergency power, exposure to wildfire smoke, exposure to rising sea levels, response time for emergency services, number of heat-related deaths and illnesses
- Possible metrics (state to develop databases for): people's ability to stay in their community and prevent displacement from green gentrification and hazards exacerbated by climate change, energy burden and assistance for households, preservation of culturally important sites and foods from climate impacts, resilience to climate through ecological solutions
- Community Health
  - Physical Well-being: Improving quality of life by reducing rates of chronic diseases (such as asthma or cardiovascular disease), reducing mortality (or reducing disparities in life expectancy at birth), improving maternal and child health and access to health care
    - Potential metrics: asthma rates, cancer rates, blood lead levels, rates of cardiovascular disease, prevalence of developmental problems, average birth weight
  - Social determinants of health
    - Potential metrics: unemployment levels; educational attainment levels; poverty levels; number of households with limited English language capabilities; housing affordability; proximity to public transit; transportation costs; proximity to food/grocery stores; proximity to social services; percentage of children eligible for free/reduced lunch; number of parks, gardens, or other green spaces within walking distance from housing areas; transit lines running to or near parks, gardens, or other green spaces; size of parks, gardens, or other green spaces
  - Workforce Training and Development: Creating green jobs, providing trainings, and supporting capacity building.
    - Possible metrics: number of jobs created for vulnerable populations within overburdened communities, number of local workers, number of part-time and full-time job per project

By developing metrics to track these indicators, policymakers, researchers, and communities can identify environmental justice issues, prioritize interventions, and monitor progress towards direct and meaningful benefits of CCA investments.