

Ms. Rachel Brombaugh  
Acting Director, Climate and Energy Initiatives  
Office of King County Executive Dow Constantine

June 4, 2020

Dear Ms. Brombaugh,

Thank you for the opportunity to comment on the Climate Action Toolkit that is being developed for use by King County-Cities Climate Collaboration members and other jurisdictions in developing or updating their climate action plans.

This letter represents the recommendations of People for Climate Action - Seattle, a chapter of the King County-wide PCA coalition. We are encouraging PCA members to submit their comments on specific Toolkit strategies through the public input tool.

Rather than submit a list of specific actions that could be included in the Toolkit, we wish to emphasize three major concepts:

*First, we recommend that the Toolkit focus first and foremost on the human activities in King County that have the greatest impact on local greenhouse gas (GHG) emissions: transportation and building energy use. Because nearly 98 percent of inventoried emissions are from transportation or buildings, including industry (GHG Emissions in King County: 2017 Inventory Update, Contribution Analysis, and Wedge Analysis), it is clear that the primary focus must be on activities that produce the greatest emissions. Other areas of activity, including land use, agriculture and waste handling, must also be examined, but the Toolkit should suggest to jurisdictions only those climate actions that can produce measurable emissions reductions.*

*Second, the Toolkit must include detailed information about the suggested greenhouse gas reduction strategies. How can each action be implemented? What emission reductions will result from implementation of each action? What will be the cost and benefits of implementation? What are the effects on historically marginalized communities? What are alternative strategies? Please provide detailed information for each strategy and an appendix of resources on best practices – in other words, a Toolkit not an idea kit. We believe the *List of Possible City Climate Actions* submitted by People for Climate Action for the building sector reflects the level of specificity the King County Toolkit should contain.*

*Finally, we submit the following list of best practices that we believe K4C jurisdictions and others should follow in developing climate action plans. We urge that a version of this list be included in the Toolkit.*

*Comprehensiveness.* Climate action plans should address all sectors of the economy, all areas of human activity, and all areas of the jurisdiction. The jurisdiction should consider the effect of all proposed ordinances, rule-making and municipal actions on greenhouse gas emissions.

*Defining actions and goals.* Specific actions should be identified that, taken together, will allow the jurisdiction to meet its GHG emissions reduction goals. Realistic and achievable reduction targets should be set at regular -- perhaps five-year -- intervals for each action.

*Public involvement in plan development.* Jurisdictions should engage key stakeholders, including labor, business, property owners, renters, environmental organizations and frontline communities in the development of plans. These key stakeholders should be involved from early on in the process of writing or rewriting climate action plans, all the way through to enactment. Effective plans may involve a mix of regulations, incentives, and revenue collection that would produce backlash without adequate public involvement and education.

*Environmental Justice and Equity.* Actions should be evaluated through an environmental justice and equity lens, and the cost of actions should not fall on those least able to pay. Low-income residents and organizations representing people of color should be involved in the development of a climate action plan. (We recommend that King County and its Toolkit consultant consult with such frontline communities before drafting and releasing the Toolkit document. The organization Front and Centered may be able to help construct a dialogue with those communities.) Climate plans should address the training and retraining of workers for jobs that support jurisdictions' GHG reduction goals.

*Cost-benefit analysis.* The projected benefits of an action should be compared to the costs. Actions with lower costs and higher benefits shall be preferred to actions with higher cost and lower benefits.

*Public education component of plan.* A climate action plan should include a public education component that informs citizens of climate-friendly steps they can take as well as explanations of public climate actions. Educational messages may address travel and consumption patterns that result in GHG emissions outside King County. These messages could be communicated through mail, email, municipal websites, utility billings, and paid advertising.

*Measuring progress.* Emissions reductions should be monitored and reported to the public in a timely manner. We suggest an annual data-based progress report that will evaluate progress toward hitting GHG emissions reduction benchmarks. The report may include performance measures in addition to greenhouse gas emissions, such as

vehicle miles traveled. Comprehensive greenhouse gas emissions inventories should be compiled and published no less than every two years.

*Plan revisions.* Modifications to improve the plan should be made on a regular basis; we suggest no less often than every three years. Ineffective actions may be deleted, and more effective actions adopted in their stead.

Sincerely,

Robin Briggs  
Elizabeth Burton  
Cynthia Ervin  
Keith Ervin  
David Ramsay  
Ron Sherman-Peterson  
Deejah Sherman-Peterson

Steering Committee, People for Climate Action - Seattle