

May 22, 2017

Lynn Gooding ([lynn.gooding@ecy.wa.gov](mailto:lynn.gooding@ecy.wa.gov)), Department of Ecology

Ms. Gooding:

For over 50 years, the Washington Environmental Council (WEC) has worked to protect, restore, and sustain Washington's environment. We focus on clean air, clean water, and clean energy for all Washingtonians. WEC proudly represents over 20,000 members, and we reach over 100,000 people.

WEC was deeply involved in writing the Model Toxics Control Act (MTCA) that was passed by Washington voters in 1988, and we have invested significant resources to protect and defend MTCA to ensure it continues to meet the needs intended by voters. Our state has successfully cleaned up about half of our 12,000 toxic waste sites – the program works.

WEC strongly supports the MTCA rule revisions related to Public Participation Grants (PPGs), and particularly the improved language around environmental justice. Our partners at Front and Centered evaluated how race and income relate to toxic waste sites. Not surprisingly, they found that across Washington State, toxic waste sites are disproportionately located in communities of color and low-income communities. Moreover, the current system may be biased toward cleaning up sites in white communities or higher-income communities. We need to remove structural and institutional barriers that have produced these patterns. One way to do so is to ensure that people of color and low-income communities have access to funds to support public participation in their communities, both to clean up existing sites and to prevent new contamination.

Very few PPG recipients to date identify as environmental justice organizations. As more groups get involved, we need to ensure they have clear grant application information and that the selection process is equitable. The first step is captured in the proposed edits to WAC 173-321-010 that give priority consideration to public participation in highly impacted or low-income communities among other factors. We urge Ecology and other state agencies to incorporate language that defines disproportionate impacts to ensure that communities of color and low-income communities no longer face higher risks.

We also agree with prioritizing organizations not funded in the previous two biennia. We do not intend to apply for a grant ourselves, nor have we received PPGs in the past. However, we see the need to ensure that environmental justice groups gain access to these important funds. We support this clarification of the previous language that was in WAC 173-321-050 related to prioritizing new grant recipients.

In summary, we support the rule revisions and we hope that Ecology moves forward expeditiously without substantive changes to the proposed rule changes to ensure PPGs are available this summer.

Sincerely,



Mindy Roberts  
Puget Sound Program Director, Washington Environmental Council