

# Front and Centered

## **Disproportionately impacted communities**

Thank you for your diligent work to ensure Washington's is moving forward with deploying monies from the VW settlement. We are pleased to see clear, concise, and informative mitigation plan which includes a focus on health, co-benefits like climate, and communities disproportionately impacted by carbon pollution.

## **General comments**

COMMENTS REFER TO ALL SECTIONS:

Thank you for your diligent work to ensure Washington's is moving forward with deploying monies from the VW settlement. We are pleased to see clear, concise, and informative mitigation plan which includes a focus on health, co-benefits like climate, and communities disproportionately impacted by carbon pollution.

Front and Centered is pleased to see recognition that low income households and communities of color are often disproportionately impacted by air pollution; not only because where we live often makes us more exposed, but also because existing social, health, and economic barriers make our communities more vulnerable to air pollution exposure and create more difficulty in responding to the impacts. Using environmental justice screening tools, such as the environmental justice map we are creating in the Washington Tracking Network, or higher resolution local tools, alongside community engagement and assessment strategies is an effective, proven approach to address these challenges.

The commitment to use mitigation funds to provide air quality benefits to vulnerable people in disproportionately impacted communities can be strengthened by clarifying this as a specific, measurable goal with metrics. As written, the modifier, "to the extent practical," leaves some ambiguity. Ecology should target emissions reductions in the disproportionately impacted areas and monitor results with quantitative and qualitative data, engaging community in the process, in implementing this plan and adjust as necessary to get results.

Ecology describes in the plan that fuels from on-road mobile vehicles constitute a majority share of diesel-particulate matter emissions, while commercial marine vessels are less than ten percent. The current plan to allocate up to 45% of funding to marine vessels could compromise Ecology's ability to direct funds to benefit disproportionately impacted communities who are affected by emissions from on-road mobiles and to meet its principles. That share should be lowered while land related investments should be increased. These must all be new, additional investments that do not displace existing pollution reduction investments anticipated or required by law.

Front and Centered is grateful to Ecology for drafting a mitigation plan that has strong promise to lower air pollution in disproportionately impacted communities and reduce greenhouse gas pollution in Washington State. We look forward to working with Ecology through program design and implementation to ensure the benefits of these investments are maximized equitably.