



February 16, 2021

Mr. Philip Gent
Environmental Engineer
Department of Ecology
State of Washington
philip.gent@ecy.wa.gov

Re: Washington State Regional Haze State Implementation Plan

Dear Mr. Gent,

On behalf of the City of Seattle Environmental Justice Committee, we write to you regarding the Regional Haze Rule and the State Implementation Plan. We are submitting the following comments regarding the Washington Department of Ecology's (Ecology) informal comment period for its Regional Haze SIP Revision - 2nd 10-Year Plan. We appreciate the opportunity to comment on this issue which greatly impacts Washington's national parks, wilderness areas, and the health and well-being of communities that have been most impacted by poor air quality.

The Environmental Justice Committee, an advisory committee to the City of Seattle and City Council on climate, environmental issues and connecting community-based solutions into government to advance environmental equity, shares your agency's belief that clean air is vital for everyone. At the same time, we know that Black and Brown communities, Indigenous and Native peoples, immigrants, refugees, people with low income, and English language learners are disproportionately affected by poor air quality and know that air quality and the health of our communities are inextricable; this fact has been painfully illustrated during the COVID-19 pandemic with polluted and historically marginalized communities experiencing more loss and more COVID-19 cases.¹

Understanding the disproportionality of environmental injustices such as air pollution is of utmost importance as we work to address environmental issues on a state and national level because it will help us (1) generate policies and practices that result in broad environmental protection and (2) dismantle systemic inequities in the environmental movement itself and those that are historically linked with environmental issues.

¹ City of Seattle Environmental Justice Committee. "Community Conversations Report." 2020.
http://www.seattle.gov/Documents/Departments/OSE/Equity/EJC/EJC_CommunityConversationsReport_Final_Web.pdf?fbclid=IwAR2u4qQLw71UgVRIJvibK1XnfJIHA1-L7JP63x3oj6C3e16-nynxSjgNOik



The EJC views the regional haze rule as a tool that should not only be used for the protection of viewsheds in Washington landmarks such as Olympic and Tahoma (Mt. Rainier) National Parks, but for the reduction of air pollution in our communities. For this reason, we urge you to evaluate Ardagh Glass and the entire glass sector and to incorporate comprehensive environmental justice criteria into your screening and evaluative processes for haze-causing facilities and industries.

By evaluating Ardagh Glass and other glass facilities as its own sector and incorporating environmental justice criteria broadly, we believe Washington state will identify emission-reducing options that if required will improve air quality around Washington state, in Seattle-area communities such as Beacon Hill, White Center, Delridge South Park and Georgetown and help achieve standards that reflect communities experiences in this round of regional haze rulemaking.

We understand that Ecology is dedicated to implementing policies and regulations that directly improve air quality for the health of Washington's communities. Ecology has stated, "Environmental justice is a priority in our efforts to restore and protect land, air, and water," that "pollution and environmental contamination can affect everyone living in Washington, but some people are significantly more burdened than others. Research shows that people of color, low-income people, and Indigenous people are disproportionately harmed by environmental hazards..." that "we're committed to making decisions that do not place disproportionate burdens on impacted communities. And we seek to lift the weight of pollution and contamination borne by those communities," and that "focusing our time and resources toward strategic actions to address these long-standing inequities will lead to improvements in health and the environment, and more resilient communities in Washington."²

We commend Ecology's stated commitment to environmental justice. The regional haze process provides an opportunity to find actionable alignment in your commitment and we strongly encourage you to not only recognize environmental justice as a priority but to imbue all your efforts to restore and protect land, air, and water with an environmental justice ethos. This means that there should not be siloed environmental justice issues, but rather environmental justice should be screening and evaluative criteria in all the work you do.

For a hyperlocal example of an opportunity to include environmental justice as a screening and evaluative criterion, we can look at Seattle's Duwamish Valley and its principal neighborhoods, South Park and Georgetown. The Duwamish Valley is a resilient, diverse, multicultural community in the heart of Seattle. The valley is home to Seattle's only river, the Duwamish, which, in addition to its immense local and regional economic importance, is culturally and economically significant to more than five local tribes for fishing and/or cultural ceremonies that have sustained their ways of life for thousands of years. The reality is that the

² Washington State Department of Ecology. "Environmental Justice at Ecology." <https://ecology.wa.gov/About-us/Accountability-transparency/Environmental-Justice#:~:text=Watson%2C%20Ecology%20Director-,Environmental%20justice%20at%20Ecology,areas%20with%20environmental%20justice%20considerations>.



Duwamish Valley communities have experienced inequities for years and as a result live with negative impacts on health and quality of life. The Duwamish River flows through the Duwamish Manufacturing and Industrial Center and is a 5.5-mile Superfund site with cumulative effects in the air, soils, waters, and lives.³ In addition, two of the 20 largest regional haze producing facilities in Washington - Ardagh Glass and Ash Grove Cement - are located in the Duwamish Valley – Ash Grove Cement and Ardagh Glass. The continued broken promises can no longer be ignored. Treaty rights, the supreme law of the land, guarantee the right to fish and harvest for all the treaty tribes who have relied upon the Duwamish River for thousands of years to sustain their health, feed their families, and provide loci for traditions, community celebration and education. The incredible disparities that Native people face across all indicators makes the exemption of the glass industry even more egregious.

Due to the compounded environmental inequities in the Valley, Georgetown and South Park residents experience some of the highest rates of environmental health disparities in the entire state. Based on the Washington Environmental Health Disparities Map that Ecology helped create, where “1” represents low environmental health disparities and “10” represents the highest, South Park and Georgetown have a “10” ranking for environmental health disparities, environmental exposures, environmental effects, socioeconomic factors, and sensitive populations.⁴

Data from the EPA and the City of Seattle’s Environmental Equity Assessment illustrate that exposure to air pollution, noise pollution, and highways is higher in the Duwamish Valley than the city average. Conversely, the distribution of environmental benefits such as open space and food access, is lower than the city average. Georgetown has 30% less open space and 70% less tree canopy than the citywide average and South Park has an average of 40 square feet of accessible open space per resident as opposed to the citywide average of 387 square feet per resident.⁵ Several health indicators show that health outcomes in the Duwamish Valley are significantly worse in these communities than they are elsewhere in the city. A study from 2013 showed that the life expectancy of South Park and Georgetown residents is an average of eight years shorter than the Seattle average and 13 years shorter than the average in Magnolia and Laurelhurst. The Duwamish Valley is also an area subject to flooding, which is projected to increase due to climate change.⁶

³ City of Seattle. “Duwamish Valley Action Plan.” 2018. http://greenspace.seattle.gov/wp-content/uploads/2018/06/DuwamishValleyActionPlan_June2018.pdf

⁴ Washington State Department of Health. “Washington Environmental Health Disparities Map.” <https://www.doh.wa.gov/DataandStatisticalReports/WashingtonTrackingNetworkWTN/InformationbyLocation/WashingtonEnvironmentalHealthDisparitiesMap>

⁵ City of Seattle. “Duwamish Valley Action Plan.”

⁶ Gould L, Cummings B.J. Seattle, WA: Just Health Action and Duwamish River Cleanup Coalition/Technical Advisory Group. March 2013. “Duwamish Valley Cumulative Health Impacts Analysis.” <http://justhealthaction.org/wp-content/uploads/2013/03/Duwamish-Valley-Cumulative-Health-Impacts-Analysis-Seattle-WA.pdf>



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South Park and Georgetown, are, in many ways, the archetypal environmental justice communities; the Duwamish Valley example illustrates that the lived reality of frontline communities is very much in line with the environmental inequities Ecology acknowledges exist in our state. Environmental standards and regulations disproportionately do not protect our communities and may be compounded by climate change such as wildfires or concentrations of pollution during low flow years.

We commend your agency's leadership to monitor and improve the State's air quality which includes the development of Washington's Regional State Implementation Plan as a critical piece to improve visibility conditions by 2064. As federal regulations continue to shift, the State has the opportunity to demonstrate strong leadership in safeguarding the health of all Washingtonians. By evaluating Ardagh Glass and other glass facilities as its own sector and incorporating comprehensive environmental justice criteria into your screening and evaluative processes for haze-causing facilities and industries, we believe Washington state will identify emission-reducing options that if required will improve air quality in our communities and help achieve reasonable progress in this round of regional haze rulemaking. Historically, conservation and environmental work has concerned itself with protecting nature from people and has thus "siloed" its work (e.g., mainstream conservation vs. environmental justice.) By connecting viewshed protection and environmental justice at the same time, we will collectively begin to dismantle the silos that exist in conservation and environmental work and chart a new, just and equitable, path forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ruby Stacey".

Ruby Stacey
Co-Chair
Seattle Environmental Justice Committee

A handwritten signature in blue ink, appearing to read "Pah-tu Pitt".

Pah-tu Pitt
Co-Chair
Seattle Environmental Justice Committee

CC:

Jessica Finn Coven, Director, City of Seattle Office of Sustainability & Environment
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