Background

The Washington Department of Ecology (Ecology) *Improving Air Quality in Overburdened Communities Initiative*[1] is a *"new effort to reduce air pollution in Washington communities highly impacted by air pollution."* The first step in this process is the identification of "overburdened" communities in Washington. Once identified, Ecology will consider: (1) expanding air quality monitoring for criteria air pollutants in these communities and (2) developing standards and strategies for reducing air pollution within these communities. Ecology has identified three sources of data[2]:

- Washington Environmental Health Disparities Map (version 2.0).
- Locations of Tribal Land.
- Pollutant concentration maps based on a combination of air monitoring data and modeling results.

Concerns with Environmental Health Disparities Map as an Evaluation Indicator

➢ It is concerning that the Environmental Health Disparity Map has little relevance to the evaluation of criteria air pollutant levels in Washington communities, yet is a key element of the initiative.

➢ Of the 19 Environmental Health Disparity Map factors, only 5 factors were related to air quality (diesel emissions, ozone, PM2.5, proximity to heavy traffic, air toxics).

➢ Of these 5 factors, 4 were based on allocations/interpolation of regional modelling or data (i.e., non-local community specific).

➢ Diesel emissions and PM2.5 concentrations have Environmental Health Disparity factor ratings of 10 and 9 (very top end of the rating scale) in certain areas. This, however, makes no sense from a health-related air quality standard standpoint, given that air quality in Washington, specifically NOx, Ozone, and PM2.5 concentrations, meets all National Ambient Air Quality Standards (NAAQS).

➢ To put the Washington Environmental Health Disparities rating for the Seattle Tacoma area in context, the Environmental Health Disparities rating of 10 for the Seattle-Tacoma urban corridor would certainly be 5 or less if assessed for California as air quality in urban areas of Washington is significantly better air quality (substantiated by its federally-designated attainment status) than urban areas of California.

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[1] https://ecology.wa.gov/Air-Climate/Climate-Commitment-Act/Overburdened-communities.
[2] https://storymaps.arcgis.com/stories/814b223ee0d14ff38e90feb90f8978d0?utm_medium=email&utm_source=govdelivery.

Key Points

➢ The objective of "Improving Air Quality in <u>Overburden Communities</u>" (Ecology's title of the initiative) is different from reducing air pollution in "Washington <u>communities highly impacted by air pollution</u>" (Ecology's stated program objective) unless the definition of "Overburden Communities" are defined as communities highly impacted by air pollution. This is clearly not the case as Ecology has defined "Overburdened Communities" by several indicators, the majority of which being non-air quality related.

➢ It is a mischaracterization of air quality in Washington to suggest that there are communities "highly impacted by air pollution" when in fact the State of Washington meets health-related federal air quality standards. Given this compliant air quality status, is the initiative "fixing a problem that does not exist"?

➢ On page 14 the TSD proposes thresholds for "elevated levels of criteria air pollutants." The TSD proposes to define "elevated" not in relation to the NAAQS, which are the scientifically vetted, legally binding standards for healthy ambient concentrations of criteria pollutants, but a long list of more stringent criteria, all of which are proposals or simply concepts. The business community should urge Ecology to define "elevated levels of criteria air pollutants" based on the NAAQS, which are set to protect the most vulnerable members of the population. Save the more stringent thresholds for consideration in a different proceeding as state ambient standard amendments under RCW 70A.15.3000

➢ Once overburden communities are identified by non-air quality indicators (except proximity to heavy traffic), then opportunities for reducing air pollution (more related to community planning, no-burn days, and health alert-oriented preventive actions) can be assessed based on the actual exposure levels on a local basis, given the overall air quality in the state of Washington meets federal standards.

➢ If air-quality factors are desired in identifying overburden communities, add as a last step as a regional overlay, understanding that the data is regional in nature (not community-specific) and the overall air quality in the state of Washington is well within federal health standards.

The air quality data for Puget Sound (PSCAA jurisdiction) further emphasize this point. As shown in the table below for 2011 Ozone and PM 2.5 levels (one of the base years for the Washington Environmental Health Disparities mapping), the Puget Sound area meets the two major air quality standards:

2011 Maximum Air Quality Concentrations		
	8-hr Ozone	**24-hr PM2.5**
Federal Standard	0.07 ppm	35 μg/m3

PSCAA	0.05 ppm	25 µg/m3

Process Recommendations

➢ Once the criteria are set, publish and take comment on a proposed list of overburdened communities. Include in the proposal the boundaries of each overburdened community and the rationale for designating it against Ecology's criteria.

➢ Establish by rule a process to determine the levels of criteria pollutants in each overburdened community (see RCW 70A.65.020(2)(a)).

➢ Establish by rule a process to set "air quality targets" for designated overburdened communities. See RCW 70A.65.020(2)(b). Include in the rule a process to designate "neighboring communities that are not identified as overburdened," and a protocol to determine ambient pollutant concentrations in those communities.

➢ Update Ecology's database of ambient monitoring data to base designations on current ambient concentrations, not data from 2014 through 2017.

➢ Publish and take comment on the plan for the ambient monitoring network to determine criteria pollutant levels in overburdened communities. [With guidance from our consultants, offer specific recommendations on types of monitors to deploy?]