

November 10, 2022

Erin Torrone
Department of Ecology

Dear Ms. Torrone,

On behalf of the Nature Conservancy, I am writing to offer some perspectives and concerns about the proposed methodology for identifying communities overburdened with air pollution. Our vision is of a world where nature and people thrive and reducing health-harming air pollution across our state is a critical piece to delivering on that vision. As proposed, the methodology seems designed to identify as small a sub-set of communities facing air pollution burdens as possible.

If it is not amended before final adoption, this approach will have the unintended consequence of creating a public perception that there is narrow binary where if a community is not represented on the map then it does not face any air pollution concerns. This does not reflect the lived experiences of communities across the state, could lead to the impression that if a community is not on the map then they will never receive any special efforts to address air pollution, and may generally erode public trust in this initiative. I don't believe this is an outcome the Department of Ecology desires. Instead, it is my understanding that the Department of Ecology is trying to identify those communities most overburdened with air pollution in order to better focus their staffs' limited time and resources. The following recommendations and highlighting of issues with the proposed methodology in this letter is offered with the intention of developing a methodology that better reflects differing impacts communities face while still providing Ecology with a way to prioritize actions and investments towards communities facing the highest level of impacts.

Recommendation: Create a Tiered Map Showing a Range of Air Pollution Impacts While it is an important and understandable desire to develop a mapping methodology that highlights areas most impacted by air pollution to better target limited resources; the current proposal overly limits the range of impacts being felt by urban and rural communities and will not serve as a resource for communities to understand the range of pollution impacting them. Instead, the Nature Conservancy recommends that the Department of Ecology develop a tiered methodology that identifies differing impacts of air pollution communities face across the state. One way to approach this would be to have 4 categories; Most Overburdened, Overburdened, Moderately Overburdened, Least Impacted. The benefit of such an approach is two-fold.

The first benefit that a tiered methodology would provide is the details and information for communities on the exact nature of the pollution impacting their health. Armed with such knowledge, community advocates and others would better be able to identify ways to mitigate or reduce the harm many are facing. Secondly, this tiered system would still allow Ecology to prioritize potentially limited resources, allowing for clear ranking in project lists for capital projects for instance, while also communicating to less impacted communities that while they may not be first on a list to receive attention that there is a path and understanding on how projects or investments may be distributed overtime. In order to develop this

tiered system, I encourage Ecology staff to work with the Department of Health, the University of Washington, tribal governments and other experts to ensure all relevant data sources are included and the mapping protocol is equitably developed.

Recommendation: Do not require “AND” between the 2nd and 3rd Air Pollution Indicators As proposed a community would have to have both high criteria air pollutants AND some other source of air pollution. This is likely to result in significantly reducing the number of communities identified as overburdened. Alternatively, if an OR statement was utilized more communities would be identified under the proposed methodology. An example of how this negatively impacts identifying a full range of communities can be relayed to how transportation corridors are included. Pollution from these corridors are a key aspect of the Environmental Health Disparities Map. However, those communities most impacted by transportation pollution may be screened out entirely if they do not also have one of the 3rd indicators.

Concern: Wildfire and Stationary Sources of Pollution Underrepresented Perhaps related to the use of “AND” as described above is that it appears that areas impacted by stationary sources are not being identified as overburdened. For example, the Lummi Nation, Swinomish Tribe, Samish Nation and areas surrounding the Cherry Point and Anacortes Refineries are not identified as overburdened when they are listed as within the 99th percentile for impacts from stationary sources. Similarly, wildfire smoke-impacted Tribal Nations and communities such as the Confederated Tribes of the Colville Reservation, Spokane Tribe, Kalispel Tribe and Wenatchee are mostly left out under the proposed methodology. Potentially, changing the requirement between the 2nd and 3rd indicators from “AND” to “OR” could address this. However, a further issue may be the need for an improved air monitoring network in Washington.

Recommendation: Expand Washington’s Air Monitoring Network A lack of existing monitoring data may reinforce the exclusion of communities who are near the pollutant thresholds. This may mean that similarly impacted communities are treated very differently if monitoring data is available for some communities and only modeling estimates for others. To address this disparity, the Department of Ecology should seek to broaden its investments in expanding our state’s air monitoring network to ensure that the “block by block” impacts of air pollution are fully captured in rural and urban communities across the state. Further, Ecology should seek public feedback in determining the full need and type of monitoring that communities would like to see deployed.

Thank you for considering the ideas proposed in these comments. Special thanks to Dr. Troy Abel at Western Washington University, Dr. Esther Min at the University of Washington and Caitlin Krenn at the Washington Environmental Council for their assistance in understanding and evaluating the proposed methodology.

Sincerely,



David B. Mendoza

Director of Advocacy & Engagement

The Nature Conservancy - Washington