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Submitted via online portal: <https://aq.ecology.commentinput.com/?id=MaBWc>

Re: Improving Air Quality in Overburdened Communities Initiative

Dear Department of Ecology,

Thank you for soliciting feedback on the process for identifying overburdened communities highly impacted by air pollution. A number of communities within the Columbia River Basin experience elevated levels of air pollution from stationary sources, transportation emissions, fossil fuel power plants, cumulative regional air pollution, increasing wildfire pollution, and concentrated animal feeding operations. Washington's Environmental Health Disparities Map highlights many of these communities along the Columbia River experiencing highly disparate impacts from air pollution.

Ecology describes an overburdened community as "a geographic area where vulnerable populations face combined, multiple environmental harms and health impacts or risks due to exposure to environmental pollutants or contaminants through multiple pathways, which may result in significant disparate adverse health outcomes or effects." More specifically, Ecology has identified screening criteria that would focus the intended scope of the initiative on the communities most disparately impacted by air pollution. While Ecology has provided helpful information about the overall effort to identify indicators, we urge Ecology to provide more detail about how and why Ecology is choosing high thresholds for environmental justice screens and levels of criteria air pollutants.

- How is Ecology evaluating the outcome of its criteria and threshold choices, which may initially exclude some communities that fail to meet one of the criteria?

- Can Ecology explore a less binary approach that helps to identify communities that are close to meeting criteria and may be overburdened by air pollution?
- How will Ecology re-evaluate the outcome of identified communities and assess which communities may be candidates for inclusion at a later time?

Ecology's proposed approach appears to underemphasize certain hazards that contribute to pronounced impacts on potentially overburdened communities. We encourage Ecology to broaden its approach to transportation-related impacts, particularly those related to traffic-congested areas. For example, congestion-related transportation emissions represent a significant concern for the Vancouver area and should inform the boundary of this overburdened community. Currently, the proposed area appears too narrow and does not correctly identify West Vancouver as overburdened. We support the inclusion of a larger area of Vancouver as a potentially overburdened community because it faces cumulative and combined effects from stationary sources (such as the River Road gas-fired power plant), wildfire smoke, and pollution sources in Oregon. There are similar overlapping issues for areas identified near the Tri-Cities. The boundaries of these areas may shift if Ecology weighs the impacts (sometimes pronounced but shorter-term, such as with wildfire smoke) that cause disparate air impacts. Ecology should consider altering its criteria to capture more of the impacts caused by transportation-related emissions, stationary sources, and wildfire smoke.

As currently proposed, some communities with known sources and environmental health disparities appear not to have made the list of overburdened communities. For example, the Longview-Kelso area faces long-term air pollution challenges, but it is not proposed for inclusion as an overburdened community. Based on our members' experience, it should be included. We support concerns raised by Longview resident Diane Dick, who provided extensive comments to Ecology with supporting data showing that the Longview area experiences pronounced health impacts from poor air quality, including in some areas that fall just below thresholds established in the environmental justice screening criteria. Areas of Longview land in the 80–90 percentile range in the environmental justice screen, shy of Ecology's proposed 90% threshold. Additionally, Longview has a high concentration of stationary sources and close proximity to heavy rail, truck, and marine traffic.

Information from Cowlitz County corroborates the concern that people in the Longview-Kelso area have experienced elevated health impacts from poor air quality for many years. [Cowlitz County's 2018 Health Impact Assessment for the Millennium Bulk Terminals proposal in Longview](#) stated:

“Deaths from heart disease in Cowlitz County were about 10% higher than the state average. Many of the mortality rates from heart disease in the near-railway neighborhoods (including Central/South Kelso, downtown Longview, Highlands/St.

Helens, and Woodland) were also higher than the state average (Figure 2). Deaths from combined chronic lower respiratory diseases were about 52% higher in Cowlitz County compared to Washington State as a whole. Many of the neighborhoods assessed also had mortality rates from chronic lower respiratory disease higher than the state average, including Central/South Kelso, downtown Longview, Highlands/St. Helens, Mint Farm/West Longview, North Kelso/Ostrander, and Woodland (Figure 3). Chronic lower respiratory diseases include asthma and emphysema, which also have higher mortality rates in Cowlitz County, although the higher mortality rate was only statistically significant⁶ for emphysema.

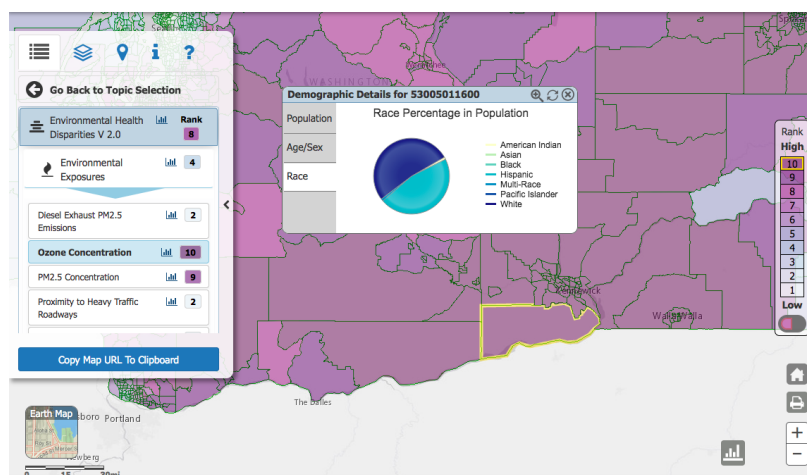
When disease rates are higher than the state average in a community, especially when that community is experiencing social and economic conditions that contribute to these differences, it is considered a health disparity. If an additional risk is added, such as increased air pollution to a community that already has health disparities, it is considered an environmental justice issue. Cowlitz County and affected neighborhoods are more vulnerable to the types of health risks associated with increased air pollution than other parts of Washington State would be.¹⁷

Additionally, Longview is one of many communities where inadequate air monitoring raises questions about how reliably Ecology can determine whether a community is experiencing elevated levels of criteria pollutants. In Vancouver, Longview, the Columbia Basin, and other areas, the air quality monitoring that underpins Ecology's analysis is combined with modeling to identify whether communities meet criteria for inclusion. The thresholds are set at seemingly high levels of criteria pollutants in areas near stationary sources (99%), often areas with air quality monitoring that may be inadequate for establishing the true baseline conditions that these communities experience. In Vancouver, a range of sources contribute to particulate matter levels just below the threshold of inclusion in areas known to experience poor air quality, and beyond those identified by Ecology so far as overburdened. Additional monitoring could confirm that additional areas deserve consideration for inclusion in the initiative.

We encourage Ecology to develop a more comprehensive approach to assess how increased monitoring might adjust boundaries for overburdened areas. If additional monitoring is only located within identified areas, Ecology may reinforce existing data gaps in areas beyond the boundaries of identified overburdened communities. Further, Ecology's lack of monitoring may fail to include communities, such as Longview, where people's lived experiences include elevated air pollution and respiratory illness.

¹ Cowlitz County. 2018. Millennium Bulk Terminals Longview Health Impact Assessment. p. 31.
<https://www.co.cowlitz.wa.us/DocumentCenter/View/15492/MBTL-HIA-and-Apps---November-2018---WEB?bidId>
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We encourage Ecology to ensure that the criteria and application of the initiative regarding overburdened communities meets the intent of the Climate Commitment Act. For example, the initiative can and should include areas that are used for traditional gathering and hunting by Tribal people and additional, diverse communities known to be experiencing pollution. For instance, Ecology should consider extending the border of identified areas close to the Washington-Oregon border, southwest of the Tri-Cities, and southeast of Yakama Nation. There are many outdoor workers in these areas, as well as proximity to both stationary sources and confined animal feeding operations in both Washington and Oregon. Additionally, these areas are at times heavily impacted by wildfire smoke along with persistently high levels of low-level ozone. Although failing to meet all environmental justice screening criteria, the area has a significant population of people of color, close to the threshold for inclusion.



In summary, we commend Ecology for taking the time to solicit public input on the development and implementation of the initiative to address overburdened communities impacted by high levels of air pollution. We encourage Ecology to go further in updating its assumptions with the most recent data available, such as for wildfire smoke impacts. And we ask that Ecology seek transparent ways to increase its flexibility in assessing how areas near the borders of identified overburdened areas (such as Vancouver and areas near the Tri-Cities), or areas that have not yet been identified for inclusion but who meet many of the criteria (such as the Longview-Kelso area), can be incorporated in some way. Ecology may need to seek additional monitoring in some areas to determine whether they are overburdened, or broaden the criteria in order to acknowledge the uncertainty involved in its assumptions.

Sincerely,

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