

Alliance for Community Engagement SWWA

Alliance for Community Engagement (ACE) SWWA is submitting a PDF comment letter via the upload link. Thank you for you work, and for speaking with ACE.

Nov. 10, 2022
Alliance for Community Engagement

Washington Department of Ecology

Dear Ecology:

Alliance for Community Engagement (ACE) is a coalition based in Vancouver that advocates for strong, equitable climate policy at the Port and City of Vancouver and at Clark PUD. ACE's constituent organizations include Washington Environmental Council, Columbia Riverkeeper, Sierra Club Loo Wit, Friends of the Gorge, Sunrise SWWA, Friends of Clark County, WA Physicians for Social Responsibility, Vancouver Audubon and LULAC. We are writing to support Ecology's efforts to identify Overburdened Communities in Washington in order to reduce air pollution in our communities, and are grateful for the opportunity to participate in this process.

We urge Ecology to include Vancouver in your list of Overburdened Communities. This includes ensuring that Vancouver has adequate monitoring data and that our community directly benefits from state resources to reduce our known air pollution. Sources of known air pollution in Vancouver include both transportation and stationary facilities. Vancouver is a thoroughfare for industrial, commercial and personal transportation, including:

- The I-5, I-205 and SR-14 corridors have heavy traffic, and the area surrounding our Port of Vancouver has heavy industry, a metal recycling plant, rail lines, a rail yard, and trucks that all contribute to air pollution.
- Trains carrying coal, crude oil, and other liquefied fossil fuels routinely pass through Vancouver.
- Air pollution from across the Columbia River doesn't stay in Portland. It comes to Vancouver. Portland Airport is across from Vancouver neighborhoods that are already heavily impacted by emissions from highways and rail.
- Vancouver's Pearson Airfield is located near the intersection of I-5 and SR-14. Aviation fuel contains lead. Airborne lead needs to be monitored, since it is a criteria pollutant.

Vancouver also has significant stationary sources of pollution, many of which are close to our downtown, City Hall, Courthouse and jail:

- Our community has six bulk fossil fuel facilities.
- Our gas-powered River Road Generating Plant (RRGP) is one of Washington's ten largest pollution emitters.

We ask that Ecology shift the application of your determination process to better account for stationary sources, and for transportation that criss-crosses Vancouver on highways and rail.

Thanks in part to ACE's persistent advocacy, the City of Vancouver recently [passed a bulk fossil fuel ordinance](#) prohibiting new and expanded bulk fossil fuel terminals. This ordinance allows for new bulk "cleaner fuels" facilities, for the conversion of bulk fossil fuel facilities to cleaner fuels through

conditional use permitting, and smaller clean fuel facilities up to 60,000 gallons through limited use permitting. We do not know if or when new facilities will be proposed, and what effects they might have on our air quality.

Much of Vancouver ranks 9 or 10 on the Health Disparities Map. Vancouver also has many neighborhoods in the 80th percentile, and a few neighborhoods in the 90th percentile, on the Environmental Justice Screen Demographic Index. We show neighborhoods in the 94th-98th percentile for Asthma Prevalence, and 92nd-94th percentile for Chronic Obstructive Pulmonary Disease. Vancouver has a substantial homeless population too. Since this Overburdened Communities program focuses on environmental justice, it makes sense for homelessness be considered as a community indicator.

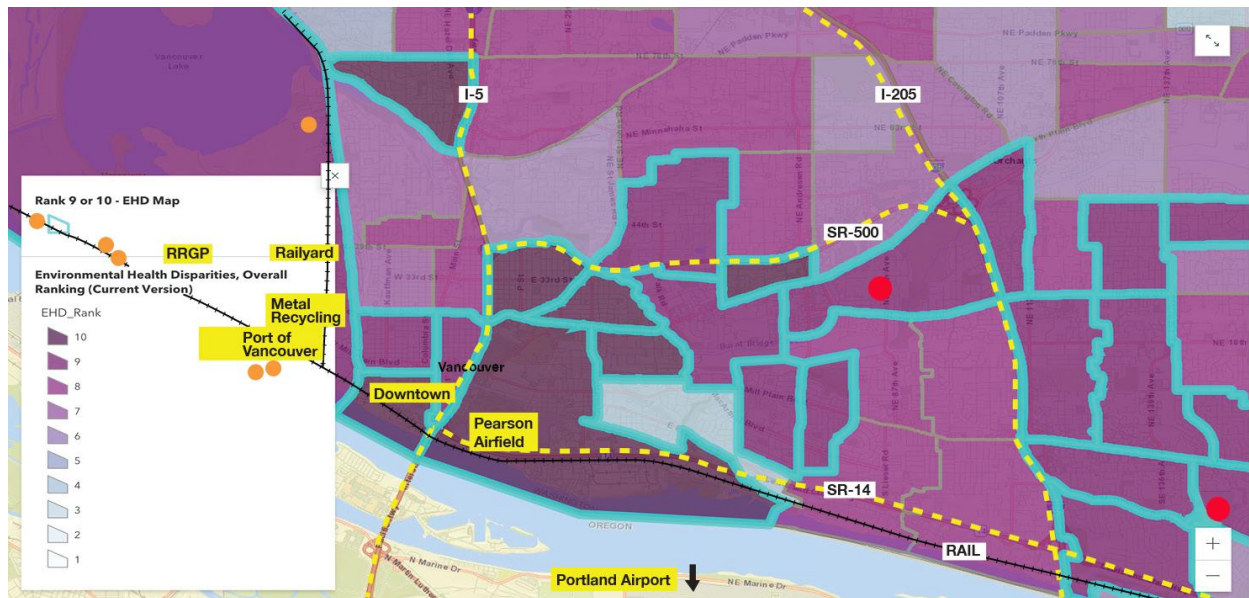


Image 1. Composite image based on the Health Disparities Map 2.0. Red dots indicate current air monitor locations. Orange dots indicate bulk fossil fuel facilities.

Vancouver currently has two air quality monitors, [one owned by SWCA](#) and the [other by Ecology](#) (both superimposed on Image 1). We are not confident that these two monitors provide sufficient data for a comprehensive picture of criteria pollutants. For example, the image above shows an odd grey shape in the middle of Vancouver that ranks a 4 out of 10, surrounded by 9s and 10s. That information, like the missing square in the Criteria Air Pollutants map in Image 2 below, appears to be a gap in data that aspires to be granular, but falls short of being thorough. As discussed in our meeting on 11/9/22, in many cases the air monitoring data needs to be updated.

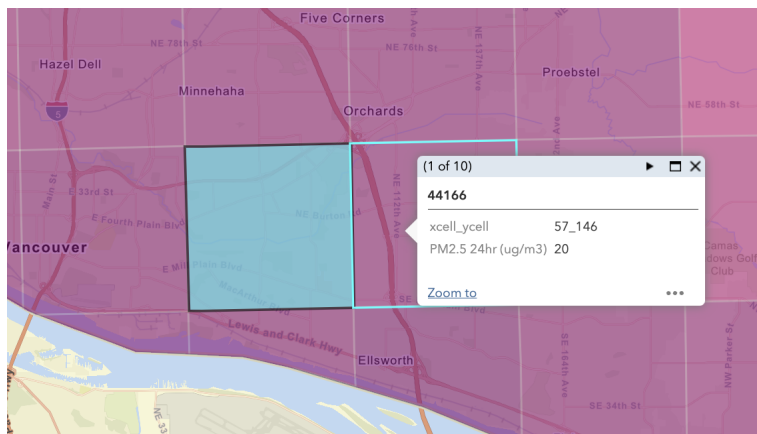


Image 2. Screen shot from the Elevated Level of Criteria Air Pollution Map.

In addition to these more persistent sources of air pollution, Vancouver has increasingly experienced the impacts of wildfire with acute periods of high pollution. Importantly, wildfire smoke adds another layer of health impacts above and beyond our regular background pollution from transportation and stationary sources. The October 2022 Nakia Creek fire in SW Washington (which put East Vancouver's air above 200 on the AQI), the 2020 Santiam Canyon fires in Oregon, and the 2017 Eagle Creek Fire in Oregon all brought wildfire smoke to Vancouver. This pattern tells us that wildfire smoke is not a one-off occurrence but rather can now be regularly expected. All of our combined air pollution negatively affects people, domestic animals, wildlife and birds.

ACE encourages Ecology to not simply categorize communities as overburdened or not, based on extremely high thresholds, but to listen to community input about our lived experience, seek more and current data by providing more air monitoring where it is clearly needed, and be flexible with boundaries and indicator levels that are close to thresholds. Otherwise, some communities risk being undervalued. As we discussed in our meeting, two ACE members live on opposite sides of Vancouver in 9/10 neighborhoods—that each are roughly 5-7 miles away from the concentrated area we spend much of our meeting focussed on (within the grey square on Image 2.)

How can Ecology get more and better data about Vancouver, without providing more air quality monitoring? It doesn't seem possible. ACE requests that Ecology establish an expanded air quality monitoring network in Vancouver, with public access to current information from that network. We would also appreciate a clear understanding of who has authority over monitoring and enforcement of air quality regulations.

As the fourth most populated city in Washington that sits at the confluence of industrial and transportation industries, Vancouver should be reflected as the Overburdened Community it is. In all likelihood, Ecology should expand the boundaries of the currently identified overburdened area in order to more fully capture the impacts that Vancouver community members are facing already. Ecology must ensure adequate resources are supplied for Vancouver and other similar communities to protect and improve our communities' health and safety. ACE also supports the letter Washington Environmental Council is submitting separately. Thank you for allowing for public input on this extremely important issue, and thank you for meeting with us.

Sincerely,
Alliance for Community Engagement SWWA