



November 10, 2022

Via Electronic Filing

Washington Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

RE: NW Energy Coalition's comments regarding the Department of Ecology's Improving Air Quality in Overburdened Communities Initiative

Dear Erin Torrone:

The NW Energy Coalition ("NWECC" or "Coalition") appreciates the opportunity to provide comments on the Department of Ecology's Improving Air Quality in Overburdened Communities Initiative (Initiative). The Coalition is a public interest nonprofit that focuses on clean energy issues in the Northwest. As an alliance of more than 100 organizations, the Coalition's work focuses on energy efficiency, renewable energy, fish and wildlife preservation and restoration in the Columbia basin, low-income and consumer protections, and informed public involvement in building a clean and affordable energy future. NWECC submitted comments on the Washington Climate Commitment Act (CCA) Program rulemaking on January 26, 2022 and July 15, 2022.^{1,2} However, this is our first time commenting on the Department of Ecology's process to reduce air pollution in Washington communities highly impacted by air pollution. As we are new to the process and are still learning how best to engage with the Initiative, NWECC's initial comments are not meant to be exhaustive.

First, it's NWECC's understanding that the draft air pollution and community indicators may be overly restrictive, leaving some opportunities on the table. We offer several suggestions to address this concern.

- Instead of requiring a 9 or 10 ranking on the Washington Environmental Health Disparities (EHD) map, we recommend prioritizing communities that have a ranking of at

¹ https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid100/did1008/pid_202271/assets/merged/hu0hieib_document.pdf?v=Q63BGN79C

² https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid100/did1008/pid_202884/assets/merged/mp0qipy_document.pdf?v=HB947RA3C

least 8 on the EHD map. More broadly, Ecology should consider using a lower rank on the EHD map and a lower percentile on the EJScreen Demographic Index as thresholds.

- Consider eliminating the multi-factor requirement that an overburdened community have both an elevated level of criteria air pollutants and exposure to a second category of pollutants.
- Explore proximity to highways, freight corridors, and superfund sites as potential community indicators.

This process has highlighted that there is existing data that can be leveraged for the purpose of identifying overburdened communities but that there are also areas where data collection and utilization could be expanded. Improving the data used for the purpose of identifying overburdened communities will likely be an iterative process and we offer the following recommendations:

- If not already included, incorporate historical data from policies that have led to harm such as redlining and the conversion of land to industrial zoning.
- Improve Washington's air quality monitoring network.
- Connect subsequent strategies to measurable health outcomes. This will require ongoing analysis and review.

While Ecology has been working on the Initiative, there are concurrent processes that may also be considering the use of the term overburdened communities in program implementation. When defining and developing methods to identify overburdened communities, we encourage Ecology to work across programs as well as coordinate with other agencies and the Environmental Justice Council to develop consistent definitions and robust methods for identifying overburdened communities. If there are inconsistencies, we recommend that Ecology clearly convey why they are using different definitions and methods for identifying overburdened communities.

Lastly, both in the current Initiative and for future processes, we encourage Ecology to conduct effective, culturally competent, and language inclusive outreach to support overburdened community engagement with the process.

Thank you for your consideration of NW Energy Coalition's comments.

Sincerely,

Annabel Drayton
Policy Associate
NW Energy Coalition
annabel@nwenergy.org