

Martha Baskin

The draft air pollution and community indicators, as written, are overly narrow and restrictive, insist on the satisfaction of an overly limited multi-factor test, do so without supplying adequate justification of the thresholds established, and exclude vulnerable communities and at-risk populations;

To improve the department's draft criteria, I respectfully recommend the following:

- 1) broaden the default pathway to identify overburdened communities by 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;
- 2) lower the thresholds for non-criteria pollutant exposure, and explaining how the selected thresholds correlate to health factors or desired outcomes; and,
- 3) account for the environmental harms and cumulative health impacts experienced by vulnerable communities and at-risk populations by creating an alternative pathway to identify overburdened communities—in addition to the default pathway—one that permits a community to apply or petition for consideration due to its lived experience with pollution, or due to special or unforeseen circumstances;

Respectfully,
Martha Baskin