

11/10/22

To: Department of Ecology

Re: Improving Air Quality in Overburdened Communities Initiative

Thank you for the opportunity to comment on the Washington Department of Ecology's Improving Air Quality in Overburdened Communities Initiative.

We are contacting you as community members who reside in the Duwamish Valley in Seattle.

Though we appreciate the opportunity to provide input during a comment period, it is repeatedly frustrating that our comments are expected only during a comment period. A comment period works under the assumptions that 1) people in our neighborhood are informed about the issue to provide an informed opinion and 2) people in our neighborhood understand the technical language, which in itself, can be very confusing and pose an intimidating barrier. How are we supposed to provide a comment if there is no education or engagement prior to a comment period? Despite its sound efforts so far, the department's process for seeking input is still not accessible to the most vulnerable populations and its proposal is not readily understandable to most people. It is important that the Department of Ecology expand its efforts to reach affected persons in potentially overburdened communities to incorporate hard-to-reach perspectives and input that could affect decisions about identifying an overburdened community, and its boundaries.

The draft air pollution and community indicators are overly narrow and restrictive. The Healthy Environment for All ("HEAL") Act is what should drive this work, first and foremost, and all frontline communities deserve appropriate monitoring. This topic hits close to home because the closest air monitor near my community, monitored by Ecology, is based on Beacon Hill - the neighborhood next to mine in Georgetown. Ecology should take into consideration topography and geographical barriers in the placement of these monitors. We live in a valley and our air quality, depending on wind patterns, will not always reflect the wind patterns on a hill. Neighborhoods in the Duwamish Valley have some of the worst air quality and pollution. Due to the valley's topography, pollutants and fine particulate matter are trapped and remain stagnant much longer than areas that have greater air flow and less obstructions. It is important that the department take topographical and geographical considerations to capture data sets that are truly reflective of overburdened communities. It is imperative that the department be clear on the selection process of placement of air monitors and expand the budget for additional air monitors in order to continue to update and expand the air monitoring network. We remain concerned that vulnerable populations are not well accounted for or represented by existing data sets and thus the department

leads with the assumption that air quality monitoring is accurately and adequately representing air quality conditions.

Data sets that do not adequately or accurately capture information can be exclusionary when a definition is too narrow. It is important that Ecology create 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.

To improve the department's draft criteria, we recommend that the department ensure frontline communities can be monitored:

- 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;
  - lowering the thresholds for non-criteria pollutant exposure, and explaining how the selected thresholds correlate to health factors or desired outcomes; and
  - accounting for the environmental harms and cumulative health impacts experienced by vulnerable communities and at-risk populations.

The thresholds being proposed by the Department of Ecology regarding overburdened communities are too narrow and meaningful community engagement remains inaccessible to overburdened communities. We encourage the department to balance education and planning processes in order to lower barriers. I heard the following quote recently: “Everything seems to be transformed except for justice”. This is the opportunity for Ecology to effect real change, uphold justice in their initiatives and truly support frontline communities.

Sincerely,

Melina Rivera and Matthew Johnson

Residents of The Duwamish Valley