

Ted Matts

Dear Ms. Erin Torrone, Thank you for the opportunity to provide public comment on the proposed process to identify overburdened communities highly impacted by air pollution. The Climate Commitment Act's directive to improve air quality in overburdened communities is critical to ensuring that the law functions as intended to reduce environmental health disparities. I appreciate Ecology's ongoing commitment to incorporating public input and developing a comprehensive framework. Having a degree in Environmental Toxicology, I understand what Ecology is attempt to put together, and I commend its efforts. Some major gaps exist. Identifying specific communities is important to make sure the focused and strategic allocation of resources. However, the proposed process limits eligibility in ways that may unintentionally and arbitrarily screen out vulnerable communities that may be inequitable and somewhat arbitrary. It needs to better document how and why specific indicators are being applied. It seems too complex as explained now and needs to be understood by communities and people who want to get involved in the process as it goes. The application of indicators in the proposed process also treats some similarly impacted communities very differently. I urge Ecology to refine both the approach and the process to ensure the equitable treatment of overburdened communities highly impacted by air pollution. It should go beyond identifying communities that are either "overburdened" or not and should reflect the gradation of pollution impact on communities, like a tiered approach to account for built-in uncertainties and margins of error, in order to ensure that similarly impacted communities are treated equitably. The proposed process seems to leave out some communities heavily impacted by stationary sources of criteria pollutants, like near refineries, paper mills, and cement factories. Make sure thresholds are low enough to incorporate uncertainties into the model's indexes, as well as corrective steps to account for margins of error and gaps in existing monitoring and modeling data. Ecology should adjust the application of the indicators so that overburdened communities highly impacted by air pollution are better shown their vulnerabilities and total pollution impact. It appears that certain communities are being screened out because they don't meet the "Elevated Level of Criteria Pollution" indicator. However, the threshold value for this indicator is a measure of exposure to criteria pollutants. Communities who meet this threshold should not be screened out, or have to meet multiple criteria pollutant thresholds. Also, the proposed process may undervalue pollution from busy roadways and transportation hubs. Because there seems to be no indicators for vehicle pollution in the proposed process, it is difficult to know if any communities are being screened out for this reason. Ecology should add one or more specific indicators for vehicle pollution. The process should also include a plan to evaluate outcomes, review communities, and revise the process at regular intervals. Thank you for taking input on this initial step through this very important process. It is indeed live or death decision making and responsible governance to consider its citizens fears, knowledge, and understanding. Regards, Ted Matts 3035 Barrell Springs RdBow, WA 98232