

# Washington Physicians for Social Responsibility

Thank you for providing this opportunity to comment on the Department of Ecology's process for identifying overburdened communities in Washington State that will receive additional monitoring and funding under the Climate Commitment Act (CCA).

Washington Physicians for Social Responsibility (WPSR) is an organization of health professionals that is working to engage Washingtonians to create a healthy, just, and sustainable world. Our members include physicians from multiple specialties, registered nurses, public health professionals, and other professionals in the healthcare sector who care about stopping climate change and the health impacts that it causes.

We would like to provide comments on the current draft plan for identifying overburdened communities, including concerns regarding the identified indicators, reasoning for chosen thresholds, and suggested improvements that would make this process equitable, accessible, and inclusive of some of our most overburdened communities now and in the future.

We commend the Department of Ecology's efforts to identify multiple health burden's to overburdened communities. However, we are concerned by the exclusionary layered approach that will screen out many communities that could be at risk of increased air pollution under the CCA, with qualifying groups needing to have both a community indicator and an air pollution indicator. We recommend eliminating the multi-factor requirement for qualifying as an overburdened community, in order to allow the program to be more inclusive to vulnerable communities that may experience health harms from poor air quality. We also recommend: lowering the threshold for inclusion under these indicators, and considering the importance of cumulative health impacts experienced by at-risk populations.

WPSR recognizes the efforts that Ecology has made to include the voices of community members that will most be most impacted by the definition of overburdened communities. However, there remain concerns about the lack of accessibility to this process faced by many community members. We recommend utilizing community engagement strategies from the Healthy Environment for All act to be more effectively inclusive of community members. This includes incorporating hard-to-access perspectives (due to language barriers, work schedules, etc.) through building on existing engagement efforts.

Finally, we are concerned about the potential for the definition of boundaries to exclude truly overburdened communities. Air pollution does not follow the strict boundaries of neighborhoods or cities, and we strongly recommend that the process of defining the boundaries of overburdened communities follow a gradient approach. We also recommend including a process for overburdened communities to apply for inclusion, with a special consideration provision for those with relevant lived experience

Thank you for the opportunity to provide comment and for your consideration.

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