

Olivia Brey

Thank you for making this commitment to address poor air quality in communities that are most impacted. In order to truly support these communities, it is vital that Ecology improves the definition of "overburdened." Drawing on the wisdom & experience from Front and Centered, I recommend that you follow their guidance to ensure frontline communities are 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;

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;

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; and

build on existing community engagement efforts across programs and agencies and align its Section 3 implementation with community engagement principles and proposals from the Healthy Environment for All ("HEAL") Act.