

Duwamish River Community Coalition (DRCC)

November 9, 2022

Erin Torrone
Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

RE: Improving Air Quality in Overburdened Communities Initiative

Dear Ms. Torrone:

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

The Duwamish River Community Coalition (DRCC) has long been community stewards for environmental and climate justice in the Duwamish Valley. The Duwamish Valley is a near-port community, one of the most polluted areas in the entire Pacific Northwest following 100 years of industrial dumping, air pollution, and release of toxic waste in the community. DRCC has worked tirelessly alongside community groups and neighbors for 20 years to clean up the water, land and air while fighting to eliminate ongoing industrial pollution that makes our communities among the least healthy in King County, WA.

Residents of the Duwamish Valley are disproportionately exposed to contamination compared to wealthier communities in the City of Seattle. People who live in Georgetown and South Park have some of the highest health differences in the City of Seattle and therefore are overburdened by air pollution. Childhood asthma hospitalization rates are the highest in the City. Heart disease death rates are 1.5 times higher than the rest of Seattle and King County. Life expectancy is 13 years shorter when compared to wealthier neighborhoods and 8 years shorter when compared to the Seattle and King County average.

While we are generally supportive of the draft list of indicators for identifying overburdened communities under Section 3 of the CCA, many gaps remain in the draft indicators and community engagement process that will be critical to address and incorporate in order to eliminate health impacts in overburdened communities.

Overall, Ecology must include indicators and parameters that address additional sources of harmful air pollution, historical disparities and vulnerabilities in the face of gentrification made worse by the continued legacy of environmental racism such as redlining, displacement, and narrow policy development that still does not reflect the full experience of living in an overburdened community.

To sharpen the department's draft criteria, we recommend the department open opportunities to expand draft air pollution and community indicators in the following ways:

Identify which Washington communities are overburdened by air pollution and the significant

sources of this pollution.

Center cumulative impacts while not limiting the departments scope:

Leverage emerging tools developed by federal agencies such as the Environmental Justice Index (EJI) cumulative impact tool. We generally agree with the department's proposed sources of data to identify communities through the Environmental Health Disparities Map Rank, EJScreen Demographic Index, and Tribal lands. Please note many overburdened communities are exposed to air pollution at the neighborhood level or in "hotspots" often missed or not adequately quantified due to the lack of effective air monitoring, disaggregated data, and regulatory compliance and/or enforcement.

Open the scope so that the department eliminates 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.

Incorporate social science and qualitative data (community stories).

Incorporate geographic data and wind patterns into the exposure factors to reflect how air pollution is made worse by or trapped due to topography of an area such as a valley.

Provide clarity around thresholds. It is unclear why the department has selected such elevated thresholds. A community should not have to be within the worst one percent or five percent of all polluted areas for a given parameter before it is considered overburdened. Thus, assuming the highest threshold may not be the most protective measure for communities facing harms from air pollution.

Step away from either/or thinking. Communities other than those identified by the draft indicators should have the option to petition, appeal or qualify as overburdened. This would allow communities that are on the verge of being identified as "overburdened communities" under the Environmental Health Disparities Map Rank and EJScreen Demographic Index requirements to access the air monitoring resources envisioned by Section 3 of the CCA. Furthermore, the department must be clear on how the placement of air monitors and potential expanding the budget for additional air monitors is determined to anticipate an update and possible expansion of the air monitoring network in the future.

Include a wider suite of air pollution sources and indicators:

The department must include a wider suite of air pollution sources such as metals, dust, odors, and additional chemicals known as air toxics. In describing proximity to stationary sources, the department does not define "major stationary sources of air pollution." It is therefore uncertain if the department would include major sources of pollution.

For example, there are many metal recycling facilities in the Duwamish Valley. DRCC recently completed a study of airborne heavy metal concentrations through an analysis of moss samples in Georgetown and South Park. Conducted with National Forest Service scientists and led by local youth from the Duwamish Valley Youth Corps (DVYC), the analysis showed significantly higher concentrations of dangerous metals in areas near the Ardagh Glass facility.

Metals considered to be hazardous air pollutants (HAPs) have been found in glass melting feedstock or its process. In this research, lead and chromium are measured at the E. Marginal Way S. (Duwamish) monitor in quantities far above the standard or action levels.

In addition, we recommend the department specifically list mobile sources of emissions that contribute to high concentrations of PM 2.5, PM 10, NOx, SOx, ultrafine particulates and leaded fuels from aviation. Examples include:

Harmful Diesel Pollution: The Duwamish Valley is disproportionately impacted by diesel pollution because it is a high traffic transportation corridor. Three freeways border the Duwamish Valley: Interstate 5, Highway 509, and the West Seattle Bridge. During the two years that the West Seattle Bridge has been closed for repairs, an average of 100,000 vehicles per day have been rerouted through the Duwamish Valley. Numerous major trucking routes pass through Georgetown and South Park, carrying freight from the Port of Seattle, and nearby industry.

Aviation: Leaded aviation fuel, known as "avgas," is used in mainly piston-engine smaller aircraft, but remains the largest single source of lead emissions in the United States. About 80% of regional ambient lead originates from the aviation sector (Avgas). King County International Airport is a user of avgas. EPA has issued its long-awaited proposed finding that lead in aviation fuel likely "endangers public health and welfare," a measure that will trigger regulation to limit lead, but the prospects for an eventual phaseout of the fuel remain unclear amid uncertainty over the "scope, applicability, timing, and nature of any subsequent rulemakings."

Factors to identify community boundaries and expand and improve Washington's air quality monitoring network.

We remain concerned many vulnerable populations are not well accounted for or represented by existing data sets and thus the department assumes air quality monitoring is accurately and adequate representing air quality conditions.

Disaggregated data must be incorporated to reflect the full experience of communities overburdened by air pollution.

In this way, federal auditors concluded toxic pollution blindspots riddle an antiquated air monitoring network.

For instance, there are only two air toxics monitors in the City of Seattle. The Department of Ecology manages one atop Beacon Hill. This air monitor is over a mile from any industries polluting the Duwamish Valley. The Puget Sound Clean Air Agency (PSCAA) operates another air toxics monitor near the Federal Center South campus. PSCAA air monitor is over a half-mile to any significant industrial polluter and failed to record air toxics data for five of the last 10 years. In fact, environmental health researchers appealed for better localized air pollution data to assess its relationship to COVID-19 trends. To this point, we recommend the follow to the department:

Must have a concrete plan to determine where the air monitoring ultimately goes led by meaningful community engagement and interactive workshops, existing community-led research and expanding the type of monitoring conducted to include more than criteria pollutants.

Lower the thresholds for non-criteria pollutant exposure, and explain how the selected thresholds correlate to health factors or desired outcomes to better protect communities, eliminate harm, and shape transformative air pollution regulation in Washington. Incorporate historical data and policies that have led to a legacy of harm and environmental racism such as redlining. More so, factor in where zoning or conversion of land to industrial zoning has impacted communities. Add proximity to highways, freight corridors and superfund sites.

Develop strategies to reduce criteria air pollutants in overburdened communities.

The department must connect strategies to measurable health outcomes at the neighborhood level.

While we champion the expansion of the air monitoring network, the department must act quickly in its power to also bring real policy, regulatory and compliance solutions to eliminate harms from air pollution to increase community well-being. Because of the goals set forth in this initiative, overburdened communities will expect transformative change to result from the placement of new air monitors throughout Washington. To this point, we recommend the department:

Increase clarity on actions following the expanded air monitoring network with accountable benchmarks to address air pollutants through just policy, regulation and enforcement to eliminate air pollution in overburdened communities.

Address and incorporate areas under exploration that are acknowledged yet not added due to data limitations, such as childhood asthma.

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.

Meaningful community engagement

Meaningful community engagement remains inaccessible to overburdened communities.

While we appreciate the department's extension in the comment period as well as the listening sessions this past winter, we continue to hear from the community that language around discussing air quality remains a barrier for the common person to understand and time spent in education is far missed by the department.

The department must lead with education first before requesting dense feedback on technical terms in order to increase inclusion and belonging in decision making spaces.

This thread also joins the need for translated planning documents and educational materials prepared at the ready (not by request) as well as compensation for participation and feedback.

We understand the department faces funding limitations, yet advocate that the time spent by ecology day-to-day in this work readjust its approach to build in education of air quality and its

health impacts. This work is heavy, requires time and dense synthesis especially in the lead up to a public comment opportunity. We encourage the department to balance education and planning processes in order to lower barriers and ultimately inspire justice in policy reflective of the needs in overburdened communities.

Deadly chemicals in our air and water should not be acceptable to any of us. Overburdened communities must be protected by stricter regulations on polluters and decision making that holistically heals and addresses the needs in overburdened communities. Our health and well being is dependent on healthy air, water, and soil -- this should be universally available and not dependent on race/ethnicity, income, language, or zip code. It is time for this harmful legacy to stop.

Sincerely,

Adrienne Hampton (she/her)
Climate Policy Manager
Duwamish River Community Coalition
adrienne@drcc.org



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

November 9, 2022

Erin Torrone
Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

RE: Improving Air Quality in Overburdened Communities Initiative

Dear Ms. Torrone:

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

The Duwamish River Community Coalition (DRCC) has long been community stewards for environmental and climate justice in the Duwamish Valley. The Duwamish Valley is a near-port community, one of the most polluted areas in the entire Pacific Northwest following 100 years of industrial dumping, air pollution, and release of toxic waste in the community. DRCC has worked tirelessly alongside community groups and neighbors for 20 years to clean up the water, land and air while fighting to eliminate ongoing industrial pollution that makes our communities among the least healthy in King County, WA.

Residents of the Duwamish Valley are disproportionately exposed to contamination compared to wealthier communities in the City of Seattle. People who live in Georgetown and South Park have some of the highest health differences in the City of Seattle and therefore are overburdened by air pollution. Childhood asthma hospitalization rates are the highest in the City. Heart disease death rates are 1.5 times higher than the rest of Seattle and King County. Life expectancy is 13 years shorter when compared to wealthier neighborhoods and 8 years shorter when compared to the Seattle and King County average.¹

While we are generally supportive of the draft list of indicators for identifying overburdened communities under Section 3 of the CCA, many gaps remain in the draft indicators and community engagement process that will be critical to address and incorporate in order to eliminate health impacts in overburdened communities.

¹ <https://deohs.washington.edu/health-impact-assessment-duwamish-cleanup-plan>



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

Overall, Ecology must include indicators and parameters that address additional sources of harmful air pollution, historical disparities and vulnerabilities in the face of gentrification made worse by the continued legacy of environmental racism such as redlining, displacement, and narrow policy development that still does not reflect the full experience of living in an overburdened community.

To sharpen the department's draft criteria, we recommend the department open opportunities to expand draft air pollution and community indicators in the following ways:

- I. Identify which Washington communities are overburdened by air pollution and the significant sources of this pollution.

Center cumulative impacts while not limiting the departments scope:

- Leverage emerging tools developed by federal agencies such as the Environmental Justice Index (EJI) cumulative impact tool.² We generally agree with the department's proposed sources of data to identify communities through the Environmental Health Disparities Map Rank, EJScreen Demographic Index, and Tribal lands. Please note many overburdened communities are exposed to air pollution at the neighborhood level or in "hotspots" often missed or not adequately quantified due to the lack of effective air monitoring, disaggregated data, and regulatory compliance and/or enforcement.
- Open the scope so that the department eliminates 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.
- Incorporate social science and qualitative data (community stories).
- Incorporate geographic data and wind patterns into the exposure factors to reflect how air pollution is made worse by or trapped due to topography of an area such as a valley.

² <https://www.atsdr.cdc.gov/placeandhealth/eji/index.html>



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

- Provide clarity around thresholds. It is unclear why the department has selected such elevated thresholds. A community should not have to be within the worst one percent or five percent of all polluted areas for a given parameter before it is considered overburdened. Thus, assuming the highest threshold may not be the most protective measure for communities facing harms from air pollution.
- Step away from either/or thinking. Communities other than those identified by the draft indicators should have the option to petition, appeal or qualify as overburdened. This would allow communities that are on the verge of being identified as “overburdened communities” under the Environmental Health Disparities Map Rank and EJScreen Demographic Index requirements to access the air monitoring resources envisioned by Section 3 of the CCA. Furthermore, the department must be clear on how the placement of air monitors and potential expanding the budget for additional air monitors is determined to anticipate an update and possible expansion of the air monitoring network in the future.

Include a wider suite of air pollution sources and indicators:

The department must include a wider suite of air pollution sources such as metals, dust, odors, and additional chemicals known as air toxics.³ In describing proximity to stationary sources, the department does not define “major stationary sources of air pollution.” It is therefore uncertain if the department would include major sources of pollution.

For example, there are many metal recycling facilities in the Duwamish Valley. DRCC recently completed a study of airborne heavy metal concentrations through an analysis of moss samples in Georgetown and South Park. Conducted with National Forest Service scientists and led by local youth from the Duwamish Valley Youth Corps (DVYC), the analysis showed significantly higher concentrations of dangerous metals in areas near the Ardagh Glass facility.

³ <https://ecology.wa.gov/Air-Climate/Air-quality/Air-quality-targets/Air-quality-standards#criteria>



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

Metals considered to be hazardous air pollutants (HAPs) have been found in glass melting feedstock or its process. In this research, lead and chromium are measured at the E. Marginal Way S. (Duwamish) monitor in quantities far above the standard or action levels.

In addition, we recommend the department specifically list mobile sources of emissions that contribute to high concentrations of PM 2.5, PM 10, NOx, SOx, ultrafine particulates and leaded fuels from aviation. Examples include:

- **Harmful Diesel Pollution:** The Duwamish Valley is disproportionately impacted by diesel pollution because it is a high traffic transportation corridor. Three freeways border the Duwamish Valley: Interstate 5, Highway 509, and the West Seattle Bridge. During the two years that the West Seattle Bridge has been closed for repairs, an average of 100,000 vehicles per day have been rerouted through the Duwamish Valley. Numerous major trucking routes pass through Georgetown and South Park, carrying freight from the Port of Seattle, and nearby industry.
- **Aviation:** Leaded aviation fuel, known as “avgas,” is used in mainly piston-engine smaller aircraft, but remains the largest single source of lead emissions in the United States. About 80% of regional ambient lead originates from the aviation sector (Avgas). King County International Airport is a user of avgas. EPA has issued its long-awaited proposed finding that lead in aviation fuel likely “endangers public health and welfare,” a measure that will trigger regulation to limit lead, but the prospects for an eventual phaseout of the fuel remain unclear amid uncertainty over the “scope, applicability, timing, and nature of any subsequent rulemakings.”⁴

II. Factors to identify community boundaries and expand and improve Washington's air quality monitoring network.

We remain concerned many vulnerable populations are not well accounted for or represented by existing data sets and thus the department assumes air quality monitoring is accurately and adequate representing air quality conditions.

⁴<https://www.epa.gov/newsreleases/epa-proposes-endangerment-finding-lead-emissions-aircraft-engines-operate-leaded-fuel>



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

Disaggregated data must be incorporated to reflect the full experience of communities overburdened by air pollution.

In this way, federal auditors concluded toxic pollution blindspots riddle an antiquated air monitoring network.⁵

For instance, there are only two air toxics monitors in the City of Seattle. The Department of Ecology manages one atop Beacon Hill. This air monitor is over a mile from any industries polluting the Duwamish Valley. The Puget Sound Clean Air Agency (PSCAA) operates another air toxics monitor near the Federal Center South campus. PSCAA air monitor is over a half-mile to any significant industrial polluter and failed to record air toxics data for five of the last 10 years. In fact, environmental health researchers appealed for better localized air pollution data to assess its relationship to COVID-19 trends.⁶⁷ To this point, we recommend the follow to the department:

- Must have a concrete plan to determine where the air monitoring ultimately goes led by meaningful community engagement and interactive workshops, existing community-led research and expanding the type of monitoring conducted to include more than criteria pollutants.
- Lower the thresholds for non-criteria pollutant exposure, and explain how the selected thresholds correlate to health factors or desired outcomes to better protect communities, eliminate harm, and shape transformative air pollution regulation in Washington.
- Incorporate historical data and policies that have led to a legacy of harm and environmental racism such as redlining.⁸ More so, factor in where zoning or conversion of land to industrial zoning has impacted communities. Add proximity to highways, freight corridors and superfund sites.

5

<https://www.google.com/url?q=https://www.gao.gov/products/gao-21-38&sa=D&source=docs&ust=1668043982265455&usg=AOvVaw0pphPXdnIKYs1GDOc-hVpE>

⁶<https://southseattleemerald.com/2021/02/28/opinion-clean-air-everywhere-for-everyone-in-washington/>

⁷ <https://ehp.niehs.nih.gov/doi/full/10.1289/EHP7411>

⁸ <https://www.npr.org/2022/03/10/1085882933/redlining-pollution-racism>



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

III. Develop strategies to reduce criteria air pollutants in overburdened communities.

The department must connect strategies to measurable health outcomes at the neighborhood level.

While we champion the expansion of the air monitoring network, the department must act quickly in its power to also bring real policy, regulatory and compliance solutions to eliminate harms from air pollution to increase community well-being. Because of the goals set forth in this initiative, overburdened communities will expect transformative change to result from the placement of new air monitors throughout Washington. To this point, we recommend the department:

- Increase clarity on actions following the expanded air monitoring network with accountable benchmarks to address air pollutants through just policy, regulation and enforcement to eliminate air pollution in overburdened communities.
- Address and incorporate areas under exploration that are acknowledged yet not added due to data limitations, such as childhood asthma.
- 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.⁹

IV. Meaningful community engagement

Meaningful community engagement remains inaccessible to overburdened communities.

While we appreciate the department's extension in the comment period as well as the listening sessions this past winter, we continue to hear from the community that language around discussing air quality remains a barrier for the common person to understand and time spent in education is far missed by the department.

The department must lead with education first before requesting dense feedback on technical terms in order to increase inclusion and belonging in decision making spaces.

⁹ RCW 70A.02



Elevating the voices of those impacted by the Duwamish River pollution and other environmental injustices to advocate for a clean, healthy, and equitable environment for people and wildlife. Promoting place-keeping and prioritizing community capacity and resilience.

This thread also joins the need for translated planning documents and educational materials prepared at the ready (not by request) as well as compensation for participation and feedback.

We understand the department faces funding limitations, yet advocate that the time spent by ecology day-to-day in this work readjust its approach to build in education of air quality and its health impacts. This work is heavy, requires time and dense synthesis especially in the lead up to a public comment opportunity. We encourage the department to balance education and planning processes in order to lower barriers and ultimately inspire justice in policy reflective of the needs in overburdened communities.

Deadly chemicals in our air and water should not be acceptable to any of us. Overburdened communities must be protected by stricter regulations on polluters and decision making that holistically heals and addresses the needs in overburdened communities. Our health and well being is dependent on healthy air, water, and soil -- this should be universally available and not dependent on race/ethnicity, income, language, or zip code. It is time for this harmful legacy to stop.

Sincerely,

A handwritten signature in black ink that reads "Adrienne Hampton". The signature is fluid and cursive, with the first name being the most prominent.

Adrienne Hampton (she/her)
Climate Policy Manager
Duwamish River Community Coalition
adrienne@drcc.org