

TO: Washington Department of Ecology

Fr: Representative Gerry Pollet (Gerry.pollet@leg.wa.gov)

RE: comments on “Improving Air Quality in Overburdened Communities Grants”

Date: June 21, 2024

I applaud Ecology’s intent to partner with community-based organizations serving overburdened communities to expand air monitoring in overburdened and highly impacted communities. However, discussions with community organizations and with Ecology in regard to issues I raised (attached joint letter from 46th and 32nd District legislators) cause concern about the criteria proposed for grants and not utilizing a community-based health assessment approach to these investments under the HEAL Act.

Ecology’s “Report on Air Quality in Overburdened Communities”(December, 2023), which serves as the basis for much of the proposed grant program, has some serious fundamental flaws that would be amplified to the harm of overburdened communities and vulnerable populations ,rather than mitigated, under the proposed program.

As we have discussed following up on the joint letter to Ecology, monitoring of air pollutants for the residents of overburdened and highly impacted communities with the greatest exposures and worst scores for health disparities is based on monitoring stations that are large distances from, and do not measure exposures for, the sensitive and vulnerable residents of areas that are now recognized as “overburdened” or “highly impacted” communities pursuant to the CCA and HEAL Act. This does not provide reliable data on the air pollution exposure of the residents of the formally recognized overburdened communities ranging from North Seattle and South Seattle to the lower Yakima and Moxee Valleys (e.g., Sunnyside and Toppenish) to Spokane.

Thus, utilizing the report as a guide to which communities should be prioritized for specific criteria air pollutants in the grant program appears highly inappropriate and biased.

Emphasis should be placed on supporting communities in establishing air quality monitoring as part of community-based health assessments by Tribes and overburdened communities and health impact zones identified by DOH pursuant to funding provided by the Legislature. At this point, it appears that Ecology’s program does not integrate with that legislatively funded set of initiatives with overlapping goals.

An emphasis should be placed not only on adding air quality monitoring programs based on areas of concern identified in the Ecology report of December 2023, but also which:

- a) Address community concerns over air quality in the overburdened and highly impacted communities that do not have direct monitoring at this time and rely on distant monitoring (if any);
 - a. Recognize that there are specific overburdened and highly impacted communities with greatly disparate conditions within the very broad areas denoted by Ecology in the December 2023 report (i.e., North Seattle, South Seattle, Lower Yakima Valley) and;
 - b. Award grants that allow for monitoring with community participation that reflects the great diversity between communities with such large geographic descriptions;

- b) Is not limited to nonattainment areas identified in the December 2023 report since it is not reliable in regard to conditions in the overburdened and highly impacted communities.
- c) Builds community group capacity to understand monitoring results and, importantly, to proceed to utilize results in environmental justice assessments and community-based health assessments / health impact zone engagements – reflecting community-based approaches to identifying methods to improve health outcomes that have community support.
- d) Provide for community engagement with appropriate access to expertise for the overburdened communities.