



WASHINGTON CONSERVATION ACTION

June 26, 2024

Kaitlyn Kelly
Overburdened Communities Grants Unit
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Re: Comments on Improving Air Quality in Overburdened Communities Grant Program

Dear Kaitlyn Kelly:

Thank you for the opportunity to provide comments on the rulemaking for the Improving Air Quality in Overburdened Communities grant program. We have organized our comments to correspond to the specific questions the Department of Ecology identified in seeking public comment.

Ecology Question 2: What do you think about our proposed scoring categories? (Organizational profile, project narrative, environmental justice, community engagement, and partnerships)

We appreciate these scoring categories and suggest adding the following additional criteria: demonstrated past success (this could be part of the organizational profile category), impact (such as the number of people served, which could be considered as a component of the environmental justice and/or community engagement categories), scalability, and program-oriented rather than project-oriented (this could be part of the project narrative category).

Ecology Question 3: What expenses would you like to see included as eligible for this grant?



(206) 631-2600



1402 3rd Ave #1400, Seattle, WA 98101



waconservationaction.org



WASHINGTON CONSERVATION ACTION

Monitoring

We have heard from many communities that a desire for additional, community-directed monitoring will help communities to understand and more effectively respond to air quality concerns. Given the intent to request biannual funding, programs and projects that establish baseline systems that can be built upon in future funding cycles makes sense as part of a grant program that is oriented toward planning and partnerships. This in turn can result in more programmatic, scalable implementation of grant funding rather than simply supporting a short-term, one-off project.

Mitigation

In a similar vein to the above comments, addressing monitoring and mitigation activities (such as distributing low-cost box fan filters) could help to reduce the burden of pollution in the short-term. This would enable communities to lessen the burden of air pollution to a broader number of residents in the short-term and facilitate a redirection of focus in subsequent funding cycles to address the root causes of pollution burdens once harm has been reduced.

Ecology Question 6: How can we mitigate or eliminate potential harms of this grant program and/or equitably distribute the benefits?

Tribal participation and timing of grant application period

We are concerned that the timing of the grant application window will not allow for full participation by Tribes who may not yet have completed consultation and negotiation with the Department of Ecology to enter into the program. Additionally, the limitations of funding one project per identified overburdened community further reduces opportunities for Tribal people to participate in the program. Tribal communities living in urban areas often comprise larger populations of Tribal people, including those who may not have representation from nearby Tribal governments that may or may not be in consultation with the state. Competition for limited grant resources further contributes to the gap in representation and access to resources for Tribal communities. To address this, we





WASHINGTON CONSERVATION ACTION

encourage Ecology to consider increasing the number of allowable projects per identified overburdened community.

Reappropriation of funding after June 30, 2025

We understand that Ecology intends to request that the legislature reappropriate funding beyond June 30, 2025, which would enable communities to complete funded activities by a later date. We strongly support this request as this would allow for more robust and effective project implementation.

Seeking ongoing funding

Based on the June 10th listening session, we understand that the Department of Ecology intends to make a request to the legislature for a biannual extension of funding. We support this request and urge Ecology to fund projects and programs with longer-term time horizons with the greatest potential for equitable impact.

Challenges of reimbursement-based payments

Small community-based organizations, especially those serving overburdened communities, are often unable to bear the up-front costs of new projects and programs, particularly without a guarantee of future funding. We strongly urge Ecology to implement the grant program in ways that allow for partial or full disbursement of funds at the project outset to foster equity in the program design.

Ecology Question 7: What else would you like to share?

Wildfire impacts should be included

While we recognize that wildfire smoke presents unique challenges for consistent air quality modeling and that aspects of addressing wildfire smoke fall into the purview of several state agencies, wildfire smoke is nevertheless one of the most significant contributors to degraded air quality in Washington. People who work outdoors and people experiencing homelessness are particularly affected by wildfire smoke. Effectively addressing the impacts of wildfire smoke to overburdened communities requires cross-agency collaboration and coordination. We strongly urge Ecology to work with other agencies including the departments of Labor and Industries, Natural Resources, and Health





WASHINGTON CONSERVATION ACTION

to identify strategies to ensure maximum investments in communities – both in the sense of geographic communities and communities defined more broadly by common characteristics - hardest hit by wildfire smoke. It is not possible to truly improve air quality in overburdened communities without including investments that reduce the air quality burden of wildfire smoke.

Sincerely,

Katie Fields

Forests and Communities Program Manager
(206) 631-2638
katie@waconservationaction.org

Stephanie Masterman

Tribal Nations Senior Manager
Tribal Citizenship: Tlingit & Haida Indian
Tribes of Alaska
(206) 631-2607
stephanie@waconservationaction.org

