



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.

June 26, 2024

Kaitlyn Kelly
Overburdened Communities Grants Unit
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98501

RE: Improving Air Quality in Overburdened Communities Grants Program

To Ms. Kelly:

The Duwamish River Community Coalition (DRCC) has long been a community steward for environmental justice in the Duwamish Valley, which is one of the most polluted areas in the entire Pacific Northwest following 100 years of industrial dumping of toxic waste and historic disinvestment in the community. DRCC has worked tirelessly alongside community groups and neighbors for more than 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 the County.

Residents of the Duwamish Valley are disproportionately exposed to air pollution compared to other communities in the City of Seattle. People who live in Georgetown and South Park have some of the most severe health inequities in the City of Seattle. 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, and life expectancy is 13 years shorter when compared to wealthier neighborhoods and eight years shorter when compared to the Seattle and King County average. Our community also lives in close proximity to several contaminated waste sites, including the Duwamish River Superfund site, and suffers from air pollution caused by drayage trucks, industry, traffic congestion, manufacturing facilities, and highways. Finally, South Park and Georgetown residents have a mere 140 square feet of accessible green space per

resident compared to 387 square feet per resident in Seattle. This is significant because tree canopy can be important in creating nature-based solutions to unhealthy air quality.

As one of the sixteen identified overburdened communities for this grantmaking, we hold uniquely valuable insights on how Ecology can create an efficient, equitable program that supports community-driven change to current air quality conditions. We appreciate the opportunity to provide input on this critical document and offer the following comments:

I. COMMUNITY-LED AIR MONITORING SHOULD BE ELIGIBLE FOR THIS GRANT.

In the Duwamish Valley, South Park, and Georgetown, residents are vastly underserved by robust, reliable, and representative air quality data that addresses community concerns. In the Duwamish Valley, residents rely on data for criteria pollutants from the Puget Sound Clean Air Agency (PSCAA), which monitors three locations at or near the Duwamish Valley: the Beacon Hill site (15th S & Charlestown), the Seattle-Duwamish site (4700 E Marginal Way S), and the South Park site (8201 10th Ave S).

While the Duwamish Valley can rely on three monitoring stations¹, the Beacon Hill site is over 4 miles away and situated on a hill. This monitor fails to accurately capture air quality conditions within the lower valley because it lacks sufficient physical proximity to Georgetown and South Park. Geographic and meteorological conditions, such as seasonal changes in wind patterns and air pressure, also create temperature inversions, ultimately trapping pollution in our community. This results in prolonged periods of lower air quality in the Duwamish Valley that are not experienced by other nearby communities.

Additionally, the Seattle-Duwamish Site is over 2.5 miles away from residents in South Park and Georgetown. It is often not representative of the air quality that residents experience due to their proximity to many polluting sources. This site also does **not monitor for five of the six criteria pollutants** (Ozone, Sulfur Dioxide, Nitrogen Oxides, Carbon Monoxide, and Lead). Finally, the South Park site – *while near residents, businesses, and parks* – **also has an incredibly limited capacity and does not include speciation for PM_{2.5}, or any of the other five criteria pollutants** (Ozone, Sulfur Dioxide, Nitrogen Oxides, Carbon Monoxide, and Lead), the measuring

¹ As of 2022 (<https://www.pscleanair.gov/DocumentCenter/View/5360/Air-Quality-Data-Summary-2022-PDF?bidId=>, pgs. 4-5):

- The Beacon Hill site monitors for
 - PM2.5 (Ref, Spec, & FEM), O2, SO2, NOy, Wind, Temp, & AT,
- the Seattle-Duwamish site monitors for
 - PM2.5 (Ref, Spec, FEM, Is, & bc), bsp, Wind, Temp AT, & Vsby, and
- the South Park site monitors for
 - PM2.5 (Is), bsp, & Vsby.

of which is particularly relevant to better understanding sources of the health disparities experienced by people who live and work in the Duwamish Valley.

Community members have long advocated for more robust, reliable, and representative air monitoring and data in the Duwamish Valley. Moreover, residents rank the risk of worsening air quality as a top priority when considering the impacts of climate change in the Duwamish Valley. Due to PSCAA's unrepresentative and often unreliable air monitoring data, community members have prioritized the need for community-led air monitoring data **in order to establish robust, baseline air quality data in the Duwamish Valley**. Community-led monitoring could support communities like ours to better understand and more effectively and accurately address, advocate and respond to air quality concerns. This grant – with the intent for biannual funding – could support the establishment of baseline, community-led air quality data.

II. REGIONAL AIR AUTHORITIES LIKE THE PUGET SOUND CLEAN AIR AGENCY SHOULD NOT BE ELIGIBLE TO APPLY FOR THIS FUNDING.

Community members in the 16 identified overburdened communities – like ours in the Duwamish Valley – and participating tribes hold the most community expertise. Regional air authorities often serve multiple communities, cover large jurisdictions, are not well-versed in community concerns, and do not know what is best for a community. Therefore, DRCC believes that regional air authorities, like PSCAA, should not be eligible to apply for this funding. Given prevailing disconnects between community needs and Agency priorities, regulatory authorities like PSCAA must demonstrate their ability to perform significant engagement in overburdened communities before said communities feel confident and represented by projects carried out by agencies. Further, with an explicit goal of providing financial support to organizations that “serve overburdened communities,” it will be most impactful to resource community-based organizations and Tribes who have already developed the relationships and trust with community members, which is necessary to do meaningful engagement and implement projects that are guided by social and environmental justice to reduce air pollution.

If Ecology determines that air authorities are eligible for this funding, they should work with members of the overburdened communities to develop accountability metrics that improve transparency around spending. These funds must go to improving air quality in overburdened communities. If grants are given to regulatory agencies instead of community groups that are more familiar with the lived experience and priorities of their own communities, additional measures must be in place to ensure that the public can track how these funds are spent.

III. THIS GRANT SHOULD UPLIFT PROJECTS LIKE THE *DUWAMISH VALLEY CLEAN AIR PROGRAM* TO REDUCE AIR POLLUTION AND ENGAGE COMMUNITY.

In 2019, DRCC relaunched the *Clean Air Program* using the Results-Based Accountability (RBA) Process with community and stakeholder participation and input. The *Clean Air Program* aims to reduce air pollution and childhood asthma hospitalization rates in the Duwamish Valley.

Utilizing the *Clean Air Program*, DRCC believes that this grant program should include funding that will support projects that:

a. Reduce vehicle emissions by:

- i. supporting the design of transition assistance programs with local and state municipalities, governments, and agencies;
- ii. working to engage with BIPOC and low-income truck drivers to identify zero-emission transition barriers and assistance;
- iii. identifying locations for necessary infrastructure (EV chargers) to support the EV transition;
- iv. expanding access to public transportation in the Duwamish Valley with community input; and
- v. advocating against the use of leaded aviation fuel at the King County International Airport, in support of Sustainable Aviation Fuel and electric charging stations.

b. Reduce industrial pollution by:

- i. working with regional air authorities, local municipalities, state governments, regulatory bodies, and community-based organizations to improve and strengthen air quality laws and regulations;
- ii. supporting, drafting, and proposing bills that strengthen clean air standards and enforcement at the local, state, and federal levels;
- iii. and hosting educational opportunities with community members to discuss legislative processes.

c. Improve indoor air quality by:

- i. conducting indoor air monitoring studies to assess the impact of individual-level solutions (ex: box-fan filters, vacuums, healthy home assessments, etc.);
- ii. working with city and county health departments to distribute box-fan filters to community members or in community spaces; and
- iii. hosting educational opportunities with community members to discuss low-cost and individual-level solutions to improve indoor air quality.

d. Improve outdoor air quality by:

- i. working with regional air authorities, local municipalities, state governments, regulatory bodies, and community-based organizations to establish permanent or temporary outdoor air monitors that utilize community input;
- ii. conducting community-led air monitoring projects;
- iii. hosting tree-planting events and increasing critical tree canopy cover;
- iv. maintaining or implementing green infrastructure in homes, businesses, and at industrial sites;
- v. maintaining or building rain gardens; and
- vi. creating new green spaces with community input.

IV. ECOLOGY'S TIMELINE FOR OUTREACH, FEEDBACK, AND IMPLEMENTATION OF THE GRANT PROGRAM IS INACCESSIBLE AND UNEQUITABLE.

While we understand that Ecology may have existing requirements that mandate funds be spent within a certain timeframe, meaningful engagement and feedback solicitation in overburdened communities require additional considerations that may not be necessary for the average community. Oftentimes, overburdened communities are inundated with requests for input, either informally or through formal comment periods. These comment periods come from a wide range of governing entities from the city to the national level. There is often no coordination between these entities, resulting in not only a large number of comment periods but also overlapping periods that make it difficult to review material and formulate feedback in a way that is helpful to decision-makers and not unduly burdensome on community members.

The timeline also prevented Ecology from engaging meaningfully with the overburdened communities that these grants would impact. To ensure that the right groups of people are being reached and heard, Ecology must do its own work to create more accessible avenues for information sharing. This includes but is not limited to translating materials, providing interpreters at live meetings (both remote and in-person), and providing materials in non-electronic forms, such as fliers at local libraries or community centers to account for individuals who may not have consistent access to the internet. These accessibility measures are almost impossible to implement within a month unless there is significant planning beforehand, which does not seem to be present with this comment period. These needs are also not consistent across overburdened communities throughout the state, and Ecology should have taken the time prior to opening this comment period to assess potential barriers to participation by working with the sixteen communities and including those considerations in the way information is shared about this comment period.

Failure to do this work will result in less meaningful feedback and is inconsistent with environmental justice principles such as co-creation, co-governance, and accessibility. People

deserve to have meaningful opportunities to participate in decision-making processes of this magnitude, particularly when the impacts stemming from their historical marginalization are still felt today and are at the very core of the problems that Ecology is trying to solve with this program.

Ecology can address these issues by planning to create longer comment periods and provide more structure and details in describing the program they are seeking comments on. As a state agency, Ecology has a better sense of its own limitations with grantmaking, the constraints of the funding source, what successful scoring procedures have looked like, and how similar funding programs have been implemented across the Agency in the past. If Ecology were to provide more details on these topics specific to this funding opportunity, it would be easier for communities to give useful feedback as part of the co-creation process. For example, it is difficult to provide input on the types of projects that should be funded or what potential harms could arise from this program when there is no proposed grant amount. If Ecology were to provide a range of potential grant amounts, it could help communities get a sense of the scale of upcoming projects, allowing them to give more specific thoughts on mitigating harm.

We also have concerns about the anticipated timeline for grant implementation. If the legislature does not grant an extension, grantees could face additional burdens that would not arise from a more reasonable timeline. Many projects that will create lasting, meaningful change will require a rollout period longer than the current timeframe of fall 2024-June 2025. Ecology should prepare to provide grantees with additional technical and capacity support if they do not receive an extension.

We appreciate this opportunity to provide comments. Please do not hesitate to contact us if you have any questions.



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