

David Friscia

I am writing to you as a concerned member of the public. My day job is not to track these complicated processes, but I care deeply about reducing toxic waste sites and their impacts on communities. You can help by making the following changes to the documents out for public comment.

We all deserve to live in a community where we can breathe clean air, drink clean water, and safely enjoy greenspaces, rivers, and lakes. And Tribes must be able to harvest healthy salmon, free from toxics, as they have since time immemorial.

As you know, most of the 14,000-plus toxic waste sites across Washington state still need to be cleaned up. Toxic waste sites exist in neighborhoods in our communities and disproportionately affect people of color and Tribes. Despite this, the state's environmental cleanup law doesn't prioritize cleanups in the places where we live.

The data is clear: People of color and low-income communities bear a disproportionate share of health risks from exposure to toxics. This includes increased risk for cancer and neurodevelopmental disorders in children. The environmental cleanup law doesn't currently factor this into deciding when, and how, toxic waste sites are cleaned up. This needs to change.

These changes must be incorporated into the Model Toxics Control Act through the current rulemaking processes:

- **Cumulative health impacts:** Toxic waste sites in Washington are often clustered in low-income communities of color. In addition to the health impacts that stem from living close to these sites, these communities also suffer from the consequences of living near other forms of pollution, including airports, freeways, and Superfund sites. When prioritizing cleanup sites and determining how they are cleaned, the cumulative impacts of living in areas where pollution is heavily concentrated must be considered.
- **Disproportionate Cost Analysis:** The Disproportionate Cost Analysis (DCA) currently fails to provide enough guidance to accurately represent the ecosystem services and public health benefits of a thorough, more protective cleanup when compared to the monetary cost of each cleanup option. This leads to a consistent underestimation of the ecosystem and public health benefits and an overrepresentation of the cleanup costs. Ecology must provide more guidance for consistent analysis that accurately represents the true benefits of ecosystem services and public health.
- **Public notice:** All members of the public have a right to know about toxic waste sites and cleanups happening in their communities. The current methods Ecology uses for public notification do not make this information sufficiently accessible, especially for those without easy access to the internet or technology. To ensure that the most effective communication strategies are being used, Ecology must gather information about the affected communities to determine the best modes of communication to reach them. In addition, Ecology must provide more effective outreach to the general public about how to find information and receive notifications beyond the current obscure website registry.

With your help, we can ensure that cleanups happen equitably. Communities deserve a strong cleanup rule that keeps them healthy and safe. There is no time to waste.