



Public Participation Plan

Spokane International Airport PFAS site

9000 W. Airport Dr., Spokane, Spokane County
Facility Site ID: 6332493, Cleanup Site ID: 16774

Toxics Cleanup Program

Washington State Department of Ecology
Spokane, Washington

March 2024

Publication Information

This document is available on the Department of Ecology's [Spokane International Airport PFAS cleanup site page](#).¹

Related Information

- Cleanup site ID: 16774
- Facility site ID: 6332493

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To request an ADA accommodation, contact the Ecology ADA Coordinator by phone at 360-407-6831 or email at ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or TTY call 711 or 877-833-6341. Visit [Ecology's website](#)³ for more information.

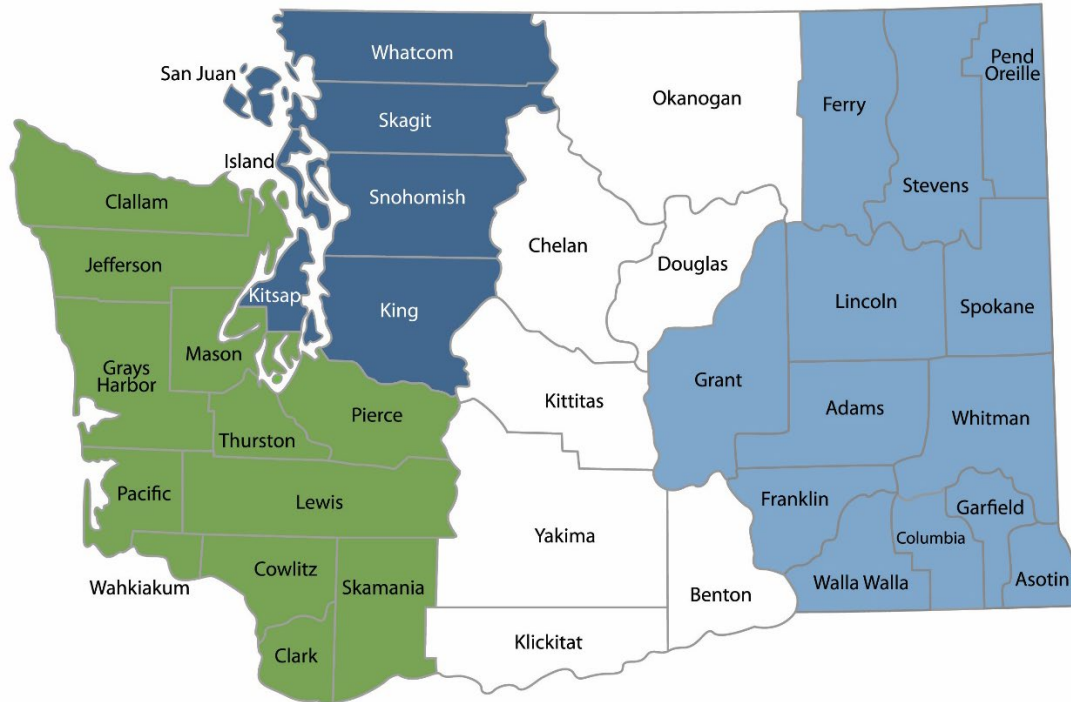
¹ <https://apps.ecology.wa.gov/cleanupsearch/site/16774>

² <https://ecology.wa.gov/About-us/Who-we-are/Our-Programs/Toxics-Cleanup>

³ <https://ecology.wa.gov/About-us/Accountability-transparency/Our-website/Accessibility>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region 360-407-6300	Northwest Region 206-594-0000	Central Region 509-575-2490	Eastern Region 509-329-3400
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Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

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Public Involvement in Contamination Cleanup

The Washington State Department of Ecology (Ecology) developed this public participation plan (plan) to promote meaningful community involvement during cleanup of the Spokane International Airport PFAS site (site).

The plan describes ways Ecology will inform the public about contamination investigations and cleanup options throughout the cleanup process. Ecology encourages the public to learn about and get involved in decision-making opportunities. This plan identifies how and when the public can get involved during different stages of the investigation and cleanup of contamination.

Public Participation Activities

Members of the public may ask questions, submit informal comments, or share site information at any time. Interested parties do not need to wait for a formal public comment period to contact Ecology.

However, to be included in the formal site record, comments about the site investigation, cleanup alternatives, or cleanups must be submitted during formal comment periods. In addition, the public is invited to review site documents before they become final. This is the most direct and influential way to learn more about the site and be involved in the cleanup's decision-making.

How we share information with the community

During specific stages of the cleanup, Ecology will mail notices about public comment periods to addresses surrounding the site. The mailing list area will vary depending on the type of contamination and where it's located, but the list will at least include addresses within a 1/4-mile radius of the site and other interested organizations and individuals upon request. These notices will provide general information about the site, contact information for submitting comments, and times and locations of public meetings or hearings or how to request one if not yet scheduled.

Ecology may also develop documents outside of comment periods to keep the community updated on the site's status. These informational documents will be available online and at document repositories. Print copies may be mailed to the nearby community if we feel the message warrants the associated cost and resources.

Comment period notices and other site announcements may also be posted in various locations throughout the community (for example, local businesses, schools, libraries).

Ecology's website and social media platforms

We maintain a website for the [Spokane International Airport PFAS cleanup site](#).⁴ The website provides site information, and you may download cleanup documents.

We may also share information about cleanup sites through [news releases, our blog, and social media](#).⁵

West Plains PFAS Updates email list

Ecology maintains the West Plains PFAS Updates email list to share information with interested persons about this site and other PFAS-related topics. If you would like to be added to the West Plains PFAS Updates email list, please [subscribe online](#),⁶ or contact Erika Beresovoy at Erika.Beresovoy@ecy.wa.gov or 509-385-2290.

Postal mailing list

Ecology maintains a mailing list that includes addresses in an area around the airport that covers almost 40 square miles (Figure 1) and 17,643 people, according to U.S. Census data. The area encompasses properties within one mile of the airport boundary to the south and west, more than four miles to the north, and almost three miles to the east. Based on public input, we extended the mailing list area north.

Spokane County's parcel data also provides us mailing addresses for property owners who do not receive mail at their physical address and may live elsewhere. If renters are at the physical address, the owner and renter should both receive notification by mail.

These people receive public comment notices in the mail when draft documents are available. These notices are also sent to the West Plains PFAS Updates email list.

We will add individuals, organizations, and other interested parties to the mailing list as requested. If you would like to be added to the mailing list for this site, please contact Erika Beresovoy at 509-385-2290 or Erika.Beresovoy@ecy.wa.gov.

⁴ <https://apps.ecology.wa.gov/cleanupsearch/site/16774>

⁵ ecology.wa.gov/About-us/Get-to-know-us/News

⁶ https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_314

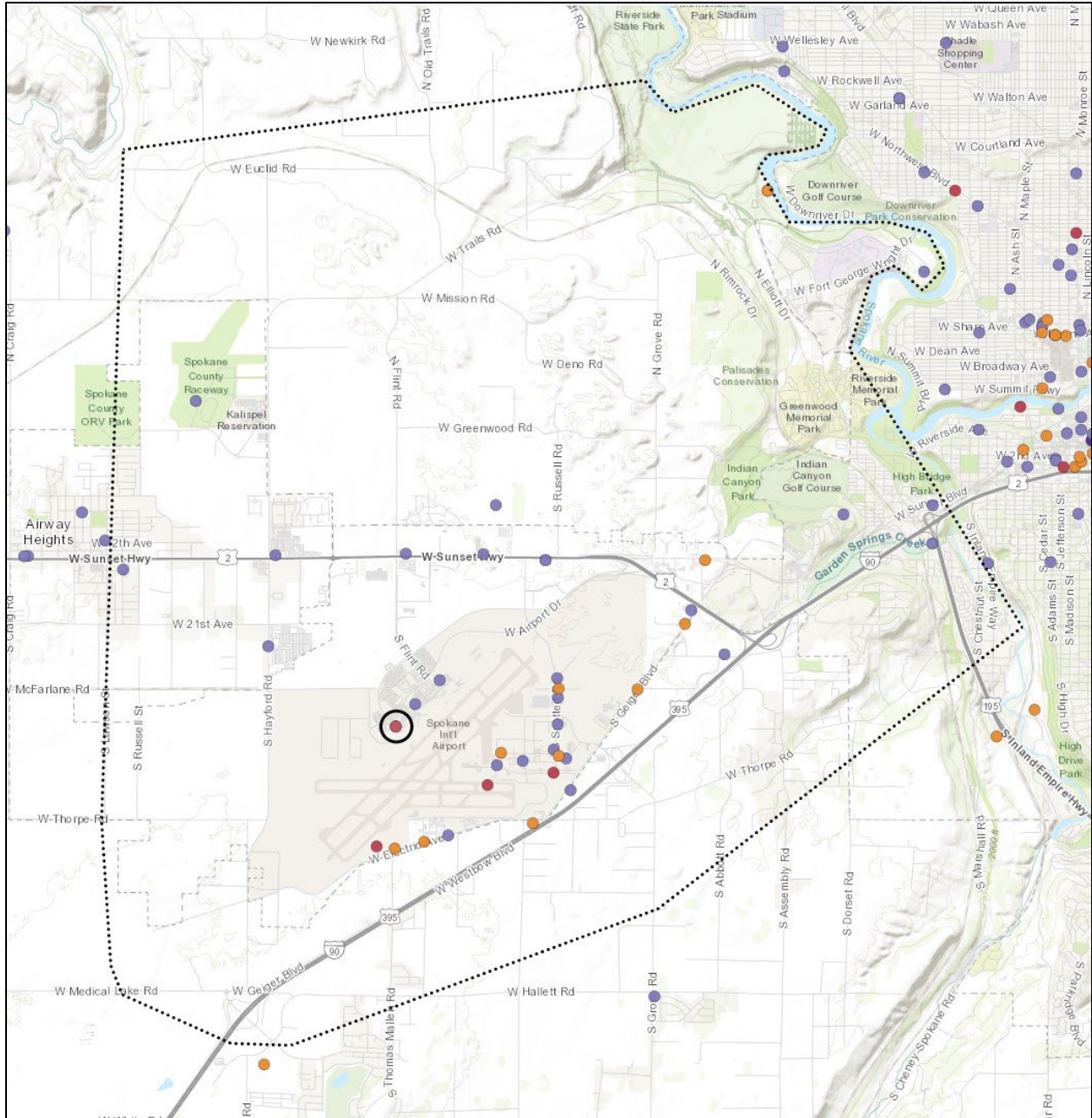


Figure 1. The mailing list area for public comment period notices.

Newspaper display ads or legal notices

We announce public comment periods and events in ads or notices published in the *Spokesman Review*. We will also publish notice on our [Public Input & Events Listing](#).⁷

⁷ ecology.wa.gov/Events/Search/Listing

Places to see print documents

Washington Department of Ecology
Eastern Regional Office
4601 N. Monroe St.
Spokane, WA 99205

To schedule an appointment, please contact Miriam Robbins at 509-329-3415 or Miriam.Robbins@ecy.wa.gov.

If you would like to be mailed print documents, please contact Erika Beresovoy at 509-385-2290 or Erika.Beresovoy@ecy.wa.gov.

Contaminated Site Register

Public comment periods, events, and other cleanup notices are published in Ecology's [Contaminated Site Register](#).⁸ To receive the *Contaminated Site Register* by email, please [subscribe online](#),⁹ or contact Sarah Kellington at sarah.kellington@ecy.wa.gov or 360-280-3167.

How to share information with us

At minimum, the Model Toxics Control Act (MTCA, see page 10 for more information) requires 30-day public comment periods for draft cleanup documents and 14-day comment periods State Environmental Policy Act (SEPA, see page 10 for more information) documents. SEPA documents are often made available for public review with other cleanup documents. In that case, we combine the comment periods, and they last at least 30 days. We may hold comment periods longer than 30 days.

We may also identify public concerns and cleanup goals by meeting with and soliciting information from interested community members and organizations. To collaborate with us about this site, please contact Erika Beresovoy at Erika.Beresovoy@ecy.wa.gov or 509-385-2290.

Public comment periods

Formal 30-day comment periods allow interested members of the public to comment on draft documents, legal agreements, and proposed cleanup actions. If there is significant interest, Ecology may extend the public comment period. When Ecology oversees SEPA determinations, we hold comment periods for at least two weeks and may extend to 30 days or more when other cleanup documents are concurrently available for review.

Following a comment period, we publish all the input we received and respond to significant comments and questions. If the comments result in significant changes to the cleanup

⁸ ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Site-Register-lists-and-data

⁹ https://public.govdelivery.com/accounts/WAECY/subscriber/new?topic_id=WAECY_118

documents, then the documents will be revised and re-issued for public review. If the comments do not result in significant changes, then they become final.

Public events

We hold public meetings, workshops, open houses, and public hearings based on community interest. If we have not scheduled a meeting, we will hold one if 10 people request it, and this may cause us to extend a public comment period so the meeting occurs during it.

Events are held at locations close to the site that meet Americans with Disabilities Act standards. Public meetings, workshops, open houses, and hearings are always announced in advance using a variety of methods.

Site contacts

To be included in the site record, comments about the cleanup process must be submitted during comment periods. Questions and informal comments or information about the site's history are welcome anytime.

Ecology

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4601 North Monroe Street
Spokane, WA 99205

Jeremy Schmidt, site manager
Jeremy.Schmidt@ecy.wa.gov
509-724-1164

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Potentially liable persons

Spokane International Airport
9000 W. Airport Drive, Suite 204
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Lisa L. Corcoran, project coordinator
lcorcoran@spokaneairports.net
509-455-6406

Public participation grants

[Public participation grants](#)¹⁰ may be available to neighborhood committees, non-profits, and other groups interested in the site. For contaminated sites, these funds can be used to:

- Hire an expert to help interpret technical information.¹¹
- Conduct activities that enhance the public's understanding of, and participation in, the cleanup process

¹⁰ <http://www.ecology.wa.gov/About-us/How-we-operate/Grants-loans/Find-a-grant-or-loan/Public-participation-grants>

¹¹ Ecology currently does not have a citizen technical advisor for providing technical assistance to citizens on issues related to the investigation and cleanup of the site.

Ecology awarded the [West Plains Water Coalition](#)¹² a public participation grant to assist with outreach about the site. Please complete the [form](#)¹³ on their website to receive their newsletter.

For more information about public participation grants, please contact Laura Busby at 360-280-5088 or Laura.Busby@ecy.wa.gov and Jill Krumlauf at 360-790-5771 or Jill.Krumlauf@ecy.wa.gov.

Site Information

Land use

Spokane County purchased two square miles in the West Plains in 1938 to create a new airport called Sunset Field.

In 1941, the War Department purchased the property to be used as a training base for World War II. The site was renamed Geiger Field after Major Harold Geiger, a U.S. military aviator who was killed in an airplane crash in 1927. The site became the first formal fire training center in 1943 and was used for this purpose through 1946.

Geiger Field closed in late 1945 when the war ended, and the site was transferred back to Spokane County and replaced Felts Field as the area's municipal airport in 1946. The name changed to Spokane International Airport in 1960 when service to Calgary in Canada began.

However, the Air Force continued to use the airport until the early 1960s, along with Fairchild Air Force Base, which was built in 1942 four miles west of the site.

The site continues to operate as a major airport.

How the site was discovered

In October 2017, SIA hired an environmental consultant to drill two new groundwater monitoring wells in the northeast part of the airport property. In November, these wells and an existing well were sampled to determine if PFAS were in groundwater. Sample results for all three wells had levels of PFAS above [Washington's recommended health safety levels](#).¹⁴

PFAS contamination had been identified in wells in and around the nearby Fairchild Air Force Base earlier in 2017. PFAS, a known human health hazard, are in firefighting foam used to control petroleum fires at airports and military installations.

In March 2019, SIA hired another consultant to sample groundwater monitoring wells for PFAS in an area that had been used for fire training drills in the southwest portion of the airport

¹² <https://westplainswater.org/>

¹³ <https://westplainswater.org/contact/membership/>

¹⁴ <https://doh.wa.gov/sites/default/files/2023-02/334-473-PFAS-StateActionLevelFactsheet.pdf>

property. Sample results for three wells had levels of PFAS above Washington’s recommended health safety levels.

In early 2023, Ecology received the [2017](#).¹⁵ and [2019 groundwater sampling results](#).¹⁶ from a third party who got them through a public records request. We completed an initial investigation, and then added the airport to the Contaminated Sites List.

Contamination

[PFAS](#)¹⁷ are manufactured chemicals that never disappear from the environment, which is why they are called “forever chemicals.” PFAS are water soluble and highly mobile. They are known to contaminate groundwater. They have been used in firefighting foam, furniture, carpet, clothing, electronics, and building insulation since the 1940s.

PFAS have been found in the blood of people and animals all over the world. Some studies on people exposed to PFAS over a long period of time indicate that exposure may have health effects.

At the site, the PFAS in groundwater is most likely from firefighting foams, namely [AFFF \(aqueous film-forming foam\)](#).¹⁸

Cleanup plans

Ecology invited SIA to negotiate an agreed order that legally requires them to complete a remedial investigation and feasibility study. The 60-day negotiation period began on October 11, 2023. SIA requested three extensions to the negotiation period. We granted the first 60-day extension, then granted a partial 30-day extension, and denied the final request. Negotiations ended March 11, 2024, and the next day, we sent them a draft enforcement order and requested they sign the agreed order by March 29. They did not sign the agreed order by the deadline, so we issued the enforcement order on March 29, 2024. The enforcement order is the legal document Ecology uses when a responsible party will not sign an agreed order.

The remedial investigation will determine the full extent and locations of contamination, regardless of property boundaries. The feasibility study will evaluate cleanup options. The agreed order includes a scope of work for the remedial investigation and feasibility study and a schedule for completing it. See Figure 3 for an overview of all the steps in the cleanup process.

¹⁵ <https://apps.ecology.wa.gov/cleanupsearch/document/123634>

¹⁶ <https://apps.ecology.wa.gov/cleanupsearch/document/125373>

¹⁷ <https://doh.wa.gov/community-and-environment/contaminants/pfas>

¹⁸ <https://ecology.wa.gov/Waste-Toxics/Reducing-toxic-chemicals/Addressing-priority-toxic-chemicals/PFAS/AFFF>

Area community

The [West Plains](#)¹⁹ area (Figure 2) is west of the City of Spokane and radiates around the City of Airway Heights, named for its higher elevation relative to Spokane. The Spokane River and associated [Riverside State Park](#)²⁰ and [Palisades Park](#)²¹ form the northeastern and eastern borders of the area. Surrounding cities include Medical Lake and Cheney, where Eastern Washington University is located.

We will provide information in other languages as appropriate following federal guidance.²² The non-English language most widely spoken in the West Plains area is Spanish. When appropriate, Ecology will provide outreach in Spanish.

Airway Heights has a variety of lodging options, restaurants, retail stores, and a community recreation center. Gaming and events can be found at the Spokane Tribe Casino and the Northern Quest Resort & Casino, owned by the Kalispel Tribe of Indians. The Kalispel Tribe also owns the Qlispé Raceway Park, which is just west of Northern Quest. The only school in Airway Heights is Sunset Elementary, and Great Northern School is about 2 miles northeast of the city limits. Airway Heights has a branch that's part of the Spokane County Library District. The Airway Heights Corrections Center is within city limits and houses 2,258 male inmates.

Ecology is working with the [West Plains Water Coalition](#)²³ and [Friends of Palisades](#)²⁴ as part of our outreach. The Coalition has hosted informative events at the [Hub](#)²⁵ in Airway Heights.

Local community events to potentially share cleanup information include:

- Airway Heights: Winterfest
- Cheney: Summer concert series, movies in the park, Holiday Hoopla, various events hosted by EWU
- Medical Lake: Founders Day, Farmers Market, Fall and Winter Festivals

We welcome invitations to join local professional and community group meetings, such as Rotary Club, Kiwanis, and League of Women Voters. We plan to follow up on the community's suggestion to interact with the Board of Realtors and the Spokane County Commissioners.

We strive to make our public participation efforts as inclusive as possible and welcome your input about how to best reach the nearby community.

¹⁹ <https://www.westplainschamber.org/>

²⁰ <https://parks.wa.gov/find-parks/state-parks/riverside-state-park>

²¹ <https://www.wta.org/go-hiking/hikes/palisades-park>

²² Guidance to Environmental Protection Agency Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 69 Fed. Reg. § 35602 (June 15, 2004).

²³ <https://westplainswater.org/>

²⁴ <https://www.friendsofpalisades.com/>

²⁵ <https://hubairwayheights.com/>

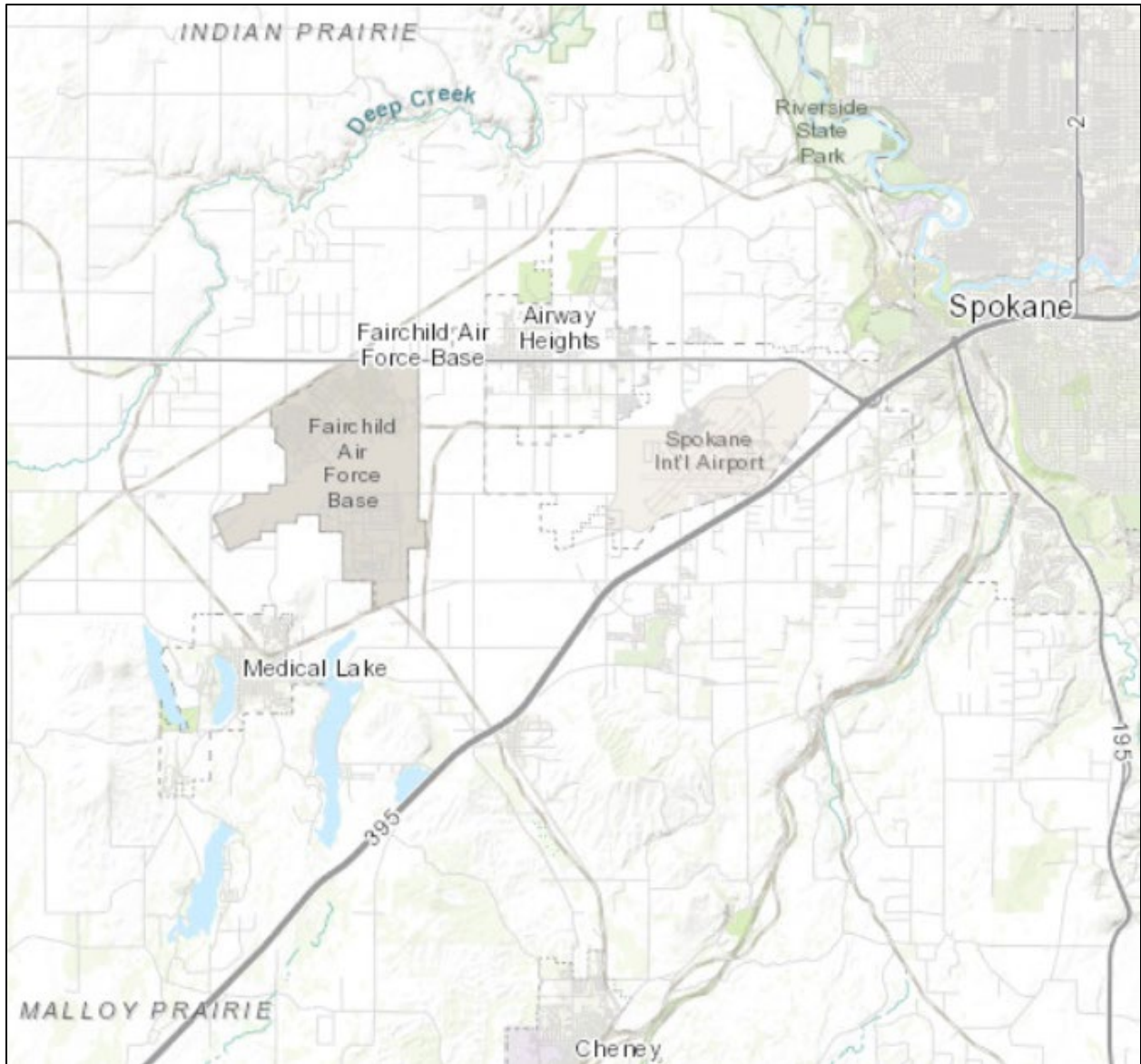


Figure 2. West Plains area map.

Groundwater and hydrogeology

The West Plains has hundreds of private groundwater wells, normally drilled into aquifers made up of basalt. There is an upper basalt layer (about 200 feet thick) that is generally more susceptible to contamination and then a lower basalt layer under it. However, there is a gravel-filled valley (paleochannel) running in a north-south direction that can increase the groundwater flow rate by up to 500 times and interconnect the basalt aquifers, making for a complex hydrogeologic setting in the West Plains.²⁶

²⁶ Information provided by Dr. Chad Pritchard, EWU professor in the Department of Geosciences.

Tribal engagement

Ecology has invited the federally recognized Kalispel and Spokane Tribes to engage with all decision-making processes for this site, and Ecology will ensure these Tribes have ample opportunity to be involved throughout the process on a government-to-government basis.

Washington's Cleanup Laws

Ecology uses the [Model Toxics Control Act](#)²⁷ (MTCA) and accompanying regulations for cleanup activities. This plan is required under MTCA, a law that passed in 1989. MTCA provides guidelines for contaminated site cleanup in Washington State and sets standards to ensure the cleanup protects human health and the environment.

Model Toxics Control Act

MTCA began as a grassroots citizen's initiative in 1988 and started the process of systematically cleaning up contaminated sites in Washington. Under MTCA, a current or past property owner or operator may be held responsible for cleaning up contamination on, or coming from, their property to standards that are safe for human health and the environment.

Ecology enacts MTCA and oversees cleanups in the state and issues regulations and guidance governing those cleanups. The regulations are found in [Chapter 173-340 Washington Administrative Code \(WAC\)](#).²⁸ Ecology investigates reports of property contamination, and if the contamination is seen as a significant threat to human health or the environment, the property is placed on the Contaminated Sites List, and the cleanup process begins.

Public participation is an important part of cleanup under the MTCA process. Participation needs are assessed at each cleanup site according to the level of public interest and the degree of risk posed by the contamination. Individuals who live near the site, community groups, businesses, government, other organizations, and interested parties can get involved by commenting on the cleanup process.

Under MTCA, the cleanup process includes multiple steps (Figure 3), with opportunities for the public to review and comment on cleanup documents. A partial cleanup (called an interim action) can occur at any time during the cleanup process.

State Environmental Policy Act

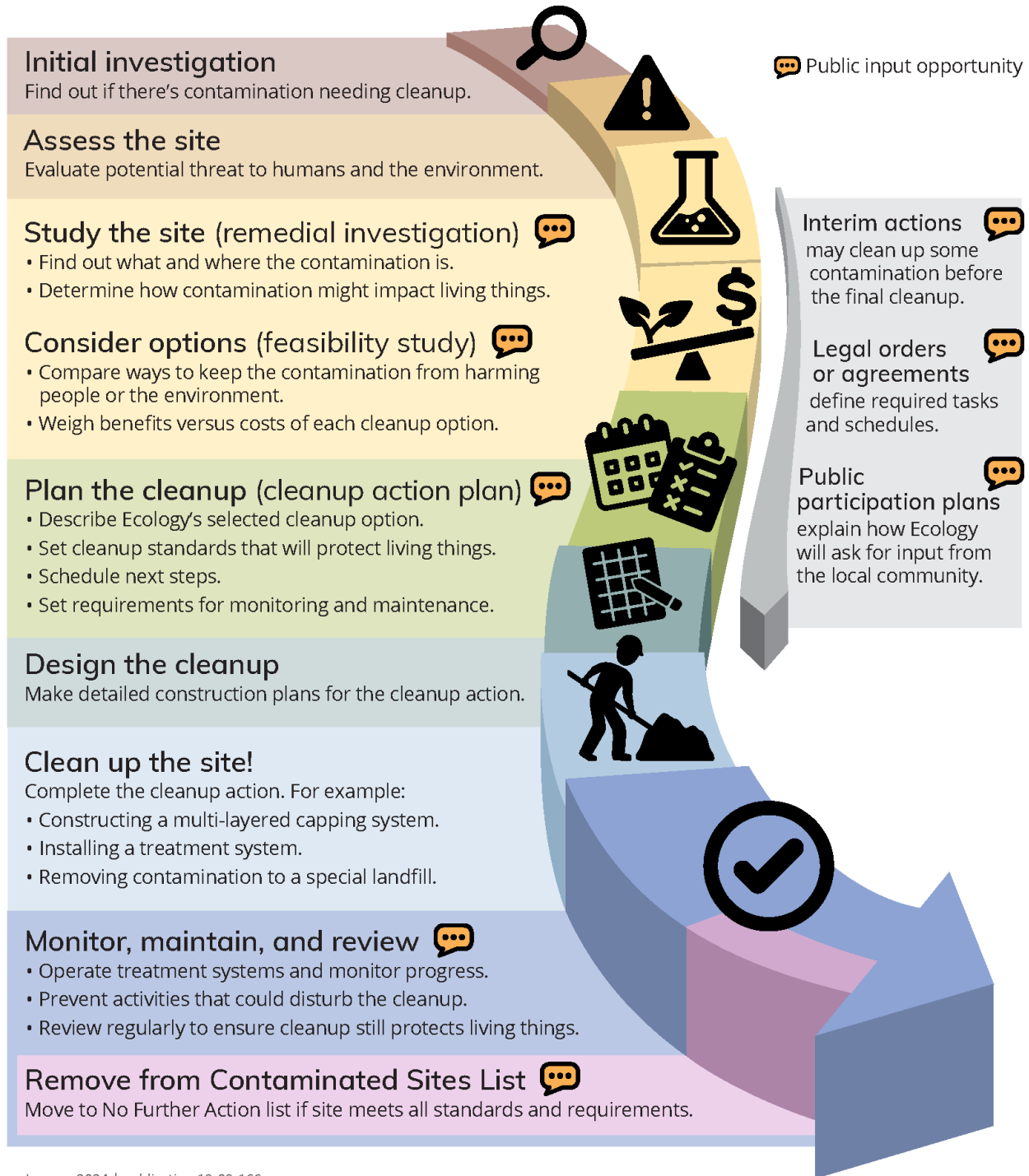
The State Environmental Policy Act (SEPA) is followed during review and development of cleanup plans.

²⁷ <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Rules-directing-our-cleanup-work/Model-Toxics-Control-Act>

²⁸ <https://app.leg.wa.gov/WAC/default.aspx?cite=173-340>

Washington's Cleanup Process

Public participation plans and comment periods are only required for cleanups under a legal agreement with Ecology. Otherwise, all cleanups follow the same steps. The steps are defined by Washington's cleanup law, the Model Toxics Control Act.



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Figure 3: Steps in Washington's Cleanup Process²⁹

Plan Amendments

Ecology developed this plan following MTCA regulations (WAC 173-340-600). We review it as the cleanup progresses and amend it as necessary. You may suggest amendments to Erika Beresovoy at Erika.Beresovoy@ecy.wa.gov or 509-385-2290.

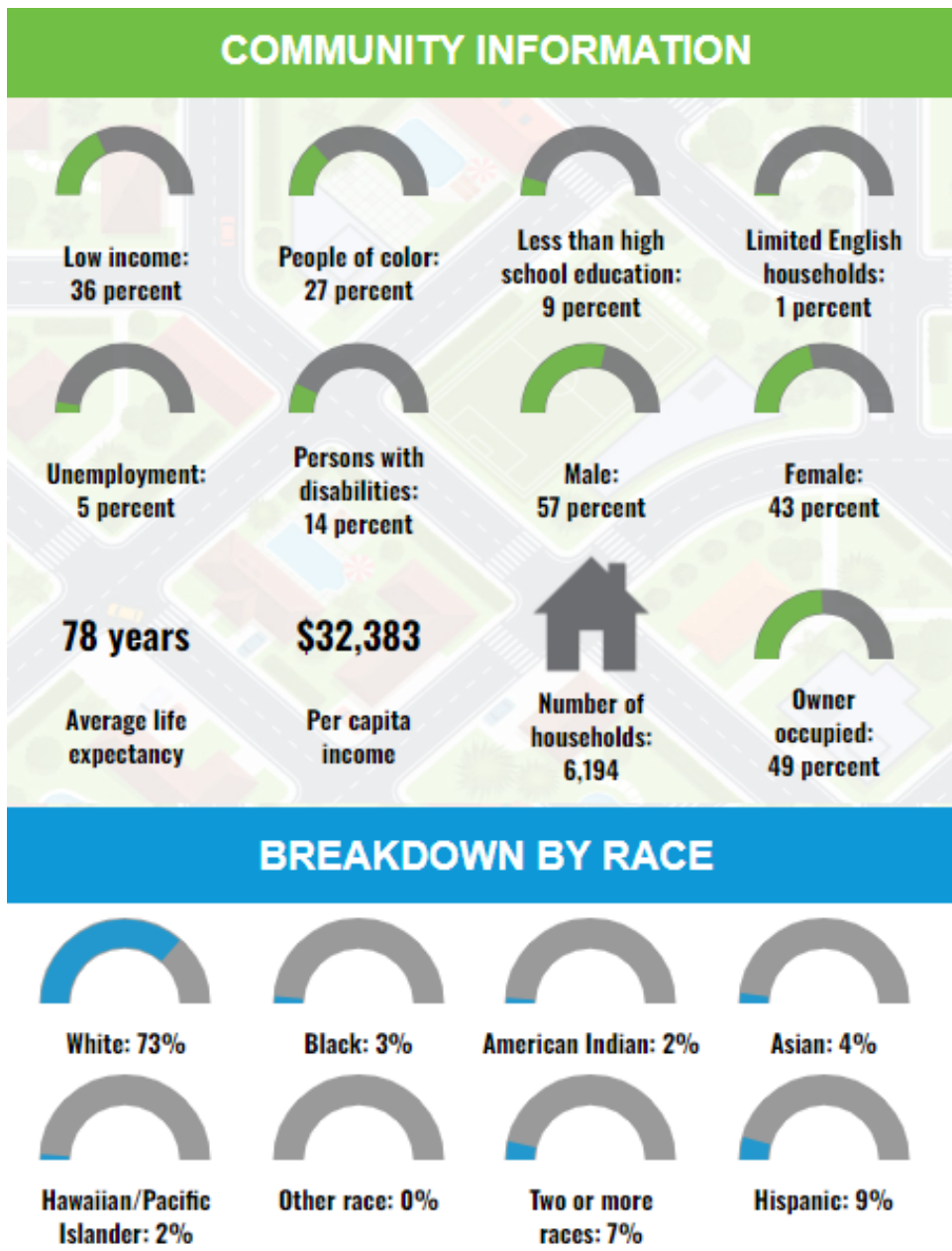
This plan includes information for the public regarding opportunities for public involvement and comment. The outreach activities discussed in this section reflect Ecology's current plans for keeping the public informed and providing ways for those interested in the site to communicate their concerns and questions to us.

If you feel the planned outreach activities and mechanisms described in this plan are insufficient, or should otherwise be modified, we will work to find solutions. New outreach activities or outreach tools established as a result can be implemented right away, with or without amending this plan.

Appendices

Appendix A. EJScreen Community Report

This report was generated using the U.S. Environmental Protection Agency’s Environmental Justice Screening and Mapping Tool [EJScreen](https://ejscreen.epa.gov/mapper/).³⁰ The data covers the mailing list area shown in Figure 3 on Page 15, which covers 39.85 square miles and has a population of 17,643 people.



³⁰ <https://ejscreen.epa.gov/mapper/>

BREAKDOWN BY AGE



LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

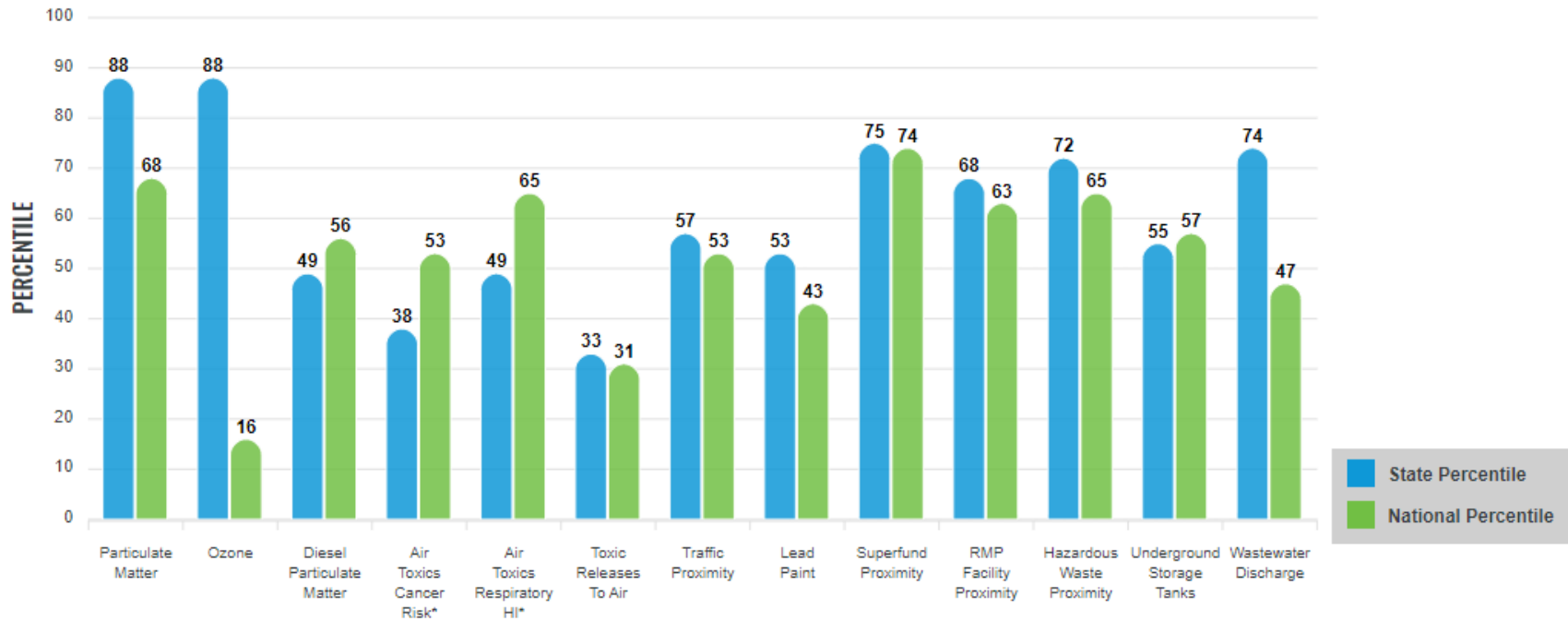
LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	90%
Spanish	3%
Russian, Polish, or Other Slavic	2%
Korean	1%
Tagalog (including Filipino)	1%
Other Asian and Pacific Island	1%
Other and Unspecified	1%
Total Non-English	10%

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

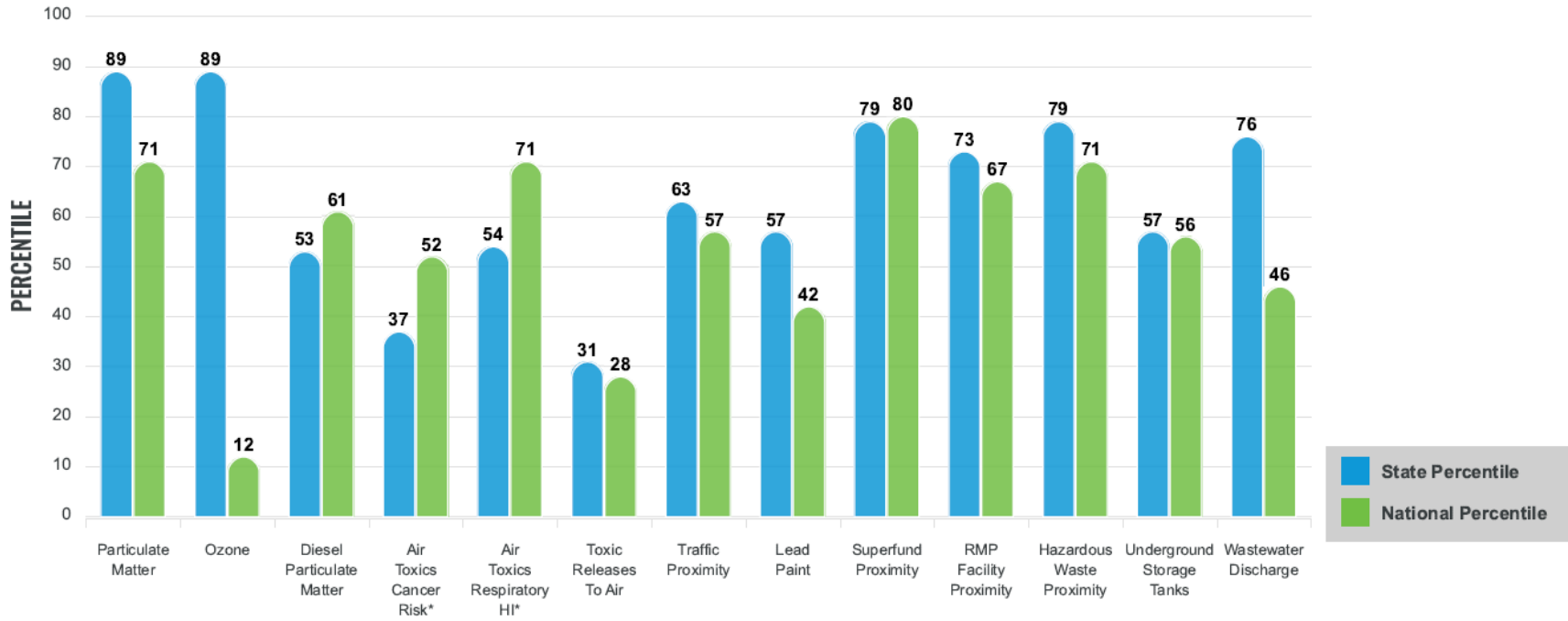
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m ³)	8.62	7.02	87	8.08	62
Ozone (ppb)	54.9	49.8	87	61.6	8
Diesel Particulate Matter (µg/m ³)	0.203	0.355	31	0.261	46
Air Toxics Cancer Risk* (lifetime risk per million)	22	27	2	25	5
Air Toxics Respiratory HI*	0.34	0.39	14	0.31	31
Toxic Releases to Air	70	1,800	20	4,600	20
Traffic Proximity (daily traffic count/distance to road)	78	190	49	210	50
Lead Paint (% Pre-1960 Housing)	0.12	0.23	47	0.3	38
Superfund Proximity (site count/km distance)	0.13	0.18	62	0.13	75
RMP Facility Proximity (facility count/km distance)	0.27	0.4	65	0.43	65
Hazardous Waste Proximity (facility count/km distance)	1.1	1.6	63	1.9	63
Underground Storage Tanks (count/km ²)	1	6.3	43	3.9	48
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.001	0.024	87	22	49
SOCIOECONOMIC INDICATORS					
Demographic Index	34%	28%	70	35%	57
Supplemental Demographic Index	15%	12%	76	14%	61
People of Color	27%	32%	49	39%	46
Low Income	36%	24%	76	31%	63
Unemployment Rate	6%	5%	65	6%	63
Limited English Speaking Households	1%	4%	65	5%	58
Less Than High School Education	9%	8%	68	12%	55
Under Age 5	6%	6%	61	6%	62
Over Age 64	12%	16%	35	17%	33
Low Life Expectancy	20%	18%	68	20%	52

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

Sites reporting to EPA within defined area:

Superfund	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities	4
Water Dischargers	38
Air Pollution	4
Brownfields	0
Toxic Release Inventory	11

Other community features within defined area:

Schools	3
Hospitals	0
Places of Worship	0

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	Yes
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	20%	18%	68	20%	52
Heart Disease	5.3	5.3	51	6.1	35
Asthma	11.2	10.5	75	10	82
Cancer	5.3	6.3	26	6.1	31
Persons with Disabilities	15.3%	13.1%	68	15.1%	67

CLIMATE INDICATORS					
INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	10%	11%	66	12%	64
Wildfire Risk	68%	12%	88	14%	87

CRITICAL SERVICE GAPS					
INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	9%	9%	64	14%	44
Lack of Health Insurance	5%	6%	51	9%	40
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A