

# Summary of Engagement and Response to Comments: Air Quality in Overburdened Communities Grant Program



## Background

As Ecology developed the new [Air Quality in Overburdened Communities Grant Program](#), we sought input on various aspects of the program to ensure our work was aligned with accessibility, equity, and the goals of the program. To this end, we hosted virtual listening sessions with Tribes and the public in May and June 2024 alongside a 28-day online [written comment period](#). Access the recordings of the [June 10](#) and [June 12](#) public listening sessions. To make these more accessible, we translated our presentation and online comment page into Spanish.

We are deeply grateful to all those who took the time to share their input with us.

## Summary

- We received approximately 139 comments that largely fall within 23 main topics, described in this document.
  - Our listening sessions included
    - 19 attendees from community-based organizations.
    - 9 attendees from other non-governmental organizations.
    - 9 attendees from local municipalities and governments.
    - 10 attendees from statewide groups.
    - 9 attendees from other organization types.
    - 10 attendees from Tribes, including Nez Perce Tribe, Confederated Tribes of Colville Reservation, Shoalwater Bay Indian Tribe, Spokane Tribe of Indians, Lummi Nation, Nooksack Indian Tribe, Cowlitz Indian Tribe, and Puyallup Tribe.
    - Attendees from 7 communities identified as overburdened and highly impacted by air pollution.
    - 6 attendees from outside of identified overburdened communities.
  - In addition to the listening sessions, we also met with 21 organizations focused on environmental justice, public health, and air quality for focused discussions.
  - This data is based on information provided by meeting registrants. It is likely we had broader representation than the data above.
- In this document, we provide an overview of the comments we received, and whether, how, and why we incorporated input into the grant program.**

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## Response to Comments

### Air monitoring

Commentors requested air monitoring be allowed as an eligible cost in the program. Air monitoring is a central component of Ecology's strategy to improve air quality across Washington. Ecology is expanding air monitoring in the communities identified as overburdened and highly impacted by air pollution, as directed by the Climate Commitment Act. Ecology's Air Monitoring Network is deploying [SensWA](#) devices to monitor pollutants across the 16 identified communities, furthering equity in monitor site selection and data available for the public. (More information is available on this [focus sheet](#).) The intent of this grant funding is to reduce sources of criteria air pollution. Because of this, we are not allowing air monitoring as an eligible cost in the grant program. This grant program will focus on supporting communities as they design and implement projects to reduce emissions of criteria air pollution. To assist with our air monitoring efforts and provide input on locating Ecology's SensWA devices, please [complete our survey](#).

### Transportation

Comments about transportation included smokey vehicle repair, replacing gas-powered vehicles with electric, large-scale transportation strategies, and reducing vehicle miles traveled. Prior to community engagement, we did not intend to include on-road vehicle projects as there are many other grant programs and funding sources dedicated to this work. Due to the high interest in projects related to on-road vehicles, we have changed our approach and are allowing for planning and community engagement projects related to on-road zero-emission transportation. We are doing this to ensure funds may be used on the highest priority projects identified by communities to reduce sources of criteria air pollution, including implementation of zero-emission transportation projects.

### Outreach, education, and engagement

Many commentors shared how important it was that these grants support community outreach, education, and engagement. We have designed the program to fully support activities needed to engage with the communities to develop criteria air pollution reduction projects. Grant funds may pay for engagement-related expenses, including, but not limited to, the cost of booking venues, designing and printing communications materials, providing light refreshments, and compensating community members for participating. Education efforts that are part of outreach and engagement will be eligible so long as they are supporting the primary goals of the grant.

## **Partnerships**

Some comments focused on partnerships, such as making it easy for multiple organizations to partner together on a potential project. We are working to ensure that collaborative applications are as easy as possible. One way we're doing this is by putting most of the application materials into forms that can easily be shared between organizations when they're working on their applications. Ecology encourages collaborative applications for projects. However, only one organization can apply on behalf of the partnership and this organization will be responsible for meeting all grant deliverables and requirements.

## **Building electrification**

Some comments related to the need for projects that replace gas or wood with electric infrastructure in buildings. Projects to replace gas with electric infrastructure are not eligible because the use of gas in homes is primarily an indoor air pollution concern. While indoor air quality is crucial to public health, it falls outside Ecology's jurisdiction. The Washington Department of Commerce administers programs to fund comprehensive weatherization. Programs that reduce sources of criteria air pollution, including changing out woodstoves for less polluting options like ductless heat pumps, will be eligible.

## **Pollution reduction**

One of the primary goals of this grant program is to reduce criteria air pollution, and some commenters asked that we include the estimated pollution reduction of a project in the scoring criteria for applications. For this grant cycle, we are allowing two types of projects: (1) projects to plan and design emission reduction projects, including required community engagement, and (2) implementing criteria air pollutant emission reduction projects that have demonstrated sufficient community engagement, or a combination of both. Since those applying for projects involving planning for emissions reduction won't yet have information about the estimated reduction, we will not score grant applications on the estimated pollution reduction of a project. Ecology will work with awardees to ensure that projects are effective at reducing criteria air pollution.

## **Burning**

We received numerous comments about reducing burning of both personal and agricultural green waste. Projects that reduce agricultural and personal yard waste burning, such as paying for tipping fees at a local compost facility or the purchase of community woodchippers, are eligible. Some of these comments focused on burn bans. While Ecology does announce burn bans, regulatory activities like that fall outside the scope of this grant program.

## **Language services and accessibility**

An essential element of good outreach and engagement is ensuring that meetings and materials are accessible and available in locally spoken languages. Several commenters asked

that the costs of language services be included as eligible within the grant program. Costs related to language services and accessibility of outreach and engagement materials are eligible under the grant program. The grant program guidelines include requirements for grantees to ensure that the outreach and engagement they conduct is as accessible to a diverse audience as is reasonable.

## **Period of performance**

Several commenters expressed concern about this grant program’s “period of performance,” which is the period during which grant projects must be completed. Currently, the funding for this grant program ends June 30, 2025. The current grant project period is through June 30, 2025. We expect to extend the project period for up to two years, although this is dependent upon Ecology receiving approval to extend the time to spend the funds

## **Industry & regulation**

We received many comments about reducing air pollution from regulated industrial sources. These are outside the scope of our grant program because developing rules and regulations is done through other means at Ecology. We will share these comments with policy and planning staff for future consideration.

## **Air filters & exposure mitigation**

Commenters requested air filters and other strategies that mitigate exposure to indoor air pollution be allowed within the grant program, either as a type of project or an eligible cost. This work is crucial but does not reduce sources of criteria air pollution, which is the purpose of this funding. Distribution of portable air cleaners will be eligible as a secondary eligible project. This means that this work must be paired with another project that focuses on direct emissions reduction. See the grant guidelines for more details and restrictions.

## **Administrative burden**

Many commenters expressed that grants can often be excessively burdensome upon both applicants and grant recipients and asked that we do whatever possible to reduce that burden. We must require certain grant management practices that may be burdensome to ensure public funds are used in an efficient and effective manner. However, to reduce the burden, we provided clear instructions, reduced the number of application forms and questions, provided templates, and will offer extensive application assistance. Administrative and indirect costs will be eligible within the grant program, and we have a team of staff who will assist with challenges that arise while executing a project.

## **Habitat restoration & tree planting**

One type of project that commenters requested be allowed in the grant program was planting trees and, more broadly, habitat restoration. Based on this feedback and additional research,

we will allow for tree planting to reduce criteria air pollution as a secondary eligible project. This means that this work must be paired with another project that focuses on direct emissions reduction. See the grant guidelines for more details, requirements, and restrictions. Purchasing land and habitat restoration projects are not allowable because these activities do not directly reduce criteria air pollution, which is the purpose of this grant program.

## **Wood stoves**

Numerous commenters expressed interest in projects that would allow for changing out old wood stoves for certified woodstoves or alternative home heating devices. This is an allowed type of project in the grant program.

## **Equipment changeout**

Some commenters asked that we allow for projects that fund equipment changeouts to replace old, polluting equipment with cleaner alternatives. The program will allow for replacing yard equipment and equipment at ports and railyards. Individual vehicles and vehicle parts replacements and replacing heating infrastructure for buildings are not eligible.

## **Wildfire**

We received some comments asking that we expand the scope of the grant to include wildfire mitigation measures. Wildfire is a significant source of criteria air pollution in many communities. However, wildfire mitigation falls outside of Ecology's authority and is under the purview of land management agencies, like the Washington State Department of Natural Resources. Furthermore, Ecology identified communities as overburdened based on air quality data that excluded pollution from wildfires and instead focused on more constant human sources of pollution, including wood stoves and traffic. Therefore, wildfire mitigation will not be an allowed project type for this grant program.

## **Technical assistance**

Commenters requested that we provide technical assistance to applicants and grantees, and we will offer both. We will host three info sessions to answer questions, share important information from the grant guidelines, and provide an overview of the application process. We will also host virtual office hours during which organizations interested in applying can ask us questions about the grant or the application. We will also be available by email ([AQcommunitygrants@ecy.wa.gov](mailto:AQcommunitygrants@ecy.wa.gov)) and phone during standard working hours. While we cannot write applications, we can direct applicants to two technical assistance centers that may provide free help: [The Center for Environmental Health Equity](#) and [The Northwest Environmental Justice Center](#).

## **Reimbursement vs. prepayment**

Several commenters asked that we allow for prepaying expenses instead of requiring grantees to submit invoices for reimbursement after costs have been incurred. Due to current state agency processes that ensure efficient and effective use of public funds, we are not able to offer prepayment options for grantees at this time. We understand the burden this may place on some applicants and strive to make the reimbursement request process as quick and easy as possible.

## **Renewable energy**

Some commenters asked that we allow for projects focused on renewable energy, such as installing solar panels on buildings or developing wind farms. While this is important work, it falls outside the scope of the grant program's focus, which is reducing sources of criteria air pollution.

## **Maximum award**

Commenters requested that we provide a grant award maximum amount for each grant application so that they can better design their projects. Ecology may award up to \$700,000 per project, though Ecology may offer a lower grant award or increase the award amount depending on the interest in the grant program. The intent is to award a project in each of the 16 communities overburdened and highly impacted by criteria air pollution and participating Tribes. There are no match requirements; grant awards will cover 100 percent of eligible costs up to the grant award maximum amount.

## **Overburdened community identification**

We received some comments expressing dissatisfaction with Ecology's process to identify overburdened communities highly impacted by air pollution. Those comments included critiques about data limitations, as well as critiques around the identification process. According to the proviso language guiding this grant program, only communities identified as overburdened and highly impacted by air pollution are eligible to apply for the grant program. However, we will share this feedback with the appropriate team for consideration when next updating the list of communities overburdened by criteria air pollution.

## **Research**

Some comments asked about grant funds being used to research topics related to criteria air pollution. Research falls outside the scope of this grant program since it will not lead directly to reduced emissions.

## Indoor air quality

Some comments asked about projects that would focus on improving indoor air quality. While indoor air quality is crucial to public health, it falls outside Ecology's jurisdiction. We expect projects funded through this program will also improve indoor air quality, but it is important that all projects prioritize the ambient air quality outdoors.

## Other Grant Programs

The Air Quality in Overburdened Communities Grants will allow for a variety of projects that reduce sources of criteria air pollution. Organizations may also be interested in the grant programs below.

- Air Quality
  - [Volkswagen enforcement action grants - Washington State Department of Ecology](#)
  - [Clean diesel grants - Washington State Department of Ecology](#)
  - [Prevent nonattainment grants - Washington State Department of Ecology](#)
  - [Wood smoke reduction grants - Washington State Department of Ecology](#)
- Transportation:
  - [Green Transportation Capital | WSDOT \(wa.gov\)](#)
  - [Consolidated public transportation | WSDOT \(wa.gov\)](#)
  - [State Buses and Bus Facilities | WSDOT \(wa.gov\)](#) (opening soon)
- Weatherization and energy efficiency:
  - [Tribal Home Electrification and Appliance Rebates Program | Department of Energy](#)
  - [Applications now available - Energy Efficiency Grant Solicitation EE-024 - Washington State Department of Commerce](#)
  - [Washington State Low Income Home Energy Assistance Program \(LIHEAP\)](#)
- Clean energy:
  - [Clean Energy Grant Programs - Washington State Department of Commerce](#)
- Agriculture and rural small business owners:
  - [Rural Energy For America Program \(REAP\) | Rural Development \(usda.gov\)](#)
- Environmental justice:
  - [Inflation Reduction Act Community Change Grants Program | US EPA](#)
- Wildfire mitigation
  - [Community Wildfire Defense Grant Program | US Forest Service \(usda.gov\)](#) (may not yet be open)



## Publication information

This report is available on the Department of Ecology's website at <https://apps.ecology.wa.gov/publications/summarypages/2402034.html>

## Contact information

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**Website**<sup>1</sup>: [Washington State Department of Ecology](https://www.ecology.wa.gov)

## ADA accessibility

The Department of Ecology is committed to providing people with disabilities access to information and services by meeting or exceeding the requirements of the Americans with Disabilities Act (ADA), Section 504 and 508 of the Rehabilitation Act, and Washington State Policy #188.

To request an ADA accommodation, contact Ecology by phone at 564-233-9765 or email at [AQcommunitygrants@ecy.wa.gov](mailto:AQcommunitygrants@ecy.wa.gov). For Washington Relay Service or TTY call 711 or 877-833-6341. Visit Ecology's website for more information.

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<sup>1</sup> [www.ecology.wa.gov/contact](https://www.ecology.wa.gov/contact)