DUWAMISH RIVER
COMMUNITY COALITION

February 18, 2025

U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Comment on EPA's Interim Framework for Advancing Consideration of Cumulative Impacts (Docket ID: EPA-HQ-OLEM-2024-0360)

The principles and the process proposed by the EPA in its framework for Advancing Consideration of Cumulative Impacts are essential for the optimization of EPA's mission to protect human health and the environment, while also critical for addressing the urgent needs the communities surrounding the Duwamish River face due to its numerous sources of pollution and health stressors. Due to its longstanding commitment to the Duwamish Valley, the Duwamish River Community Coalition is pleased to provide the following comments on the framework.

The Duwamish Valley (DV) neighborhoods, part of the 98108 zip code, face poorer air quality than the rest of Seattle because of higher traffic related air pollution and other industrial emissions [1,2,3]. Situated along the Duwamish River, a Superfund site resulting from decades of unmonitored and unregulated industrial activity, and bordered by 3 high traffic highways, residents of the 98108 zip code have 40% higher rates of childhood asthma hospitalizations, some of the highest heart disease mortality rates in the city, and life expectancies 13 years shorter than residents in wealthier areas of Seattle.[4]

Residents that face these differences in health are mostly non-white; approximately 70% of residents in the 98108 zip code are Asian, Pacific Islander, Hispanic, African American, and Native American.[5]

---

[1] Schulte, J. K. et al. Neighborhood-Scale Spatial Models of Diesel Exhaust Concentration Profile Using 1-Nitropyrene and Other Nitroarenes. Environ. Sci. Technol. 49, 13422–13430 (2015).
[2] Gilroy, M., Himes Strange, K. & Yost, M. Tacoma and Seattle Area Air Toxics Evaluation.https://pscleanair.gov/DocumentCenter/View/145/2010-Tacoma-and-Seattle-Area-Air-Toxics-Evaluation---Full-Report-PDF?bidId= (2010).
[3] Larson, T. et al. Ambient air quality measurements from a continuously moving mobile platform: Estimation of area-wide, fuel-based, mobile source emission factors using absolute principal component scores. Atmos. Environ. 152, 201–211 (2017).
[4] Gould, L. & Cummings, B. Duwamish Valley Cumulative Health Impacts Analysis. https://www.duwamishcleanup.org/chia (2013).
[5] Gould, L. Health Impact Assessment. https://deohs.washington.edu/sites/default/files/research/HIA-Tech-FINAL-Residents.pdf (2013).

Our organization, the Duwamish River Community Coalition, aims to address these discrepancies at our local level through environmental law and policy work, youth empowerment programing, and general community empowerment. Yet, in the past and presently, our residents that face the mentioned health disparities and risk factors cannot count on comprehensive frameworks at the federal level to address the cumulative impacts they experience.

Opportunely, the principles set forth in this framework will consider the cumulative health risks in pollution and other risk factors, will pave the way for preventing new pollution sources from worsening existing disparities, and open the door for impact statements that consider cumulative impacts to become standard in permitting.

Due to this framekwork's inceptive nature, we have five suggestions for its improvement:

1. We support the development of a framework that considers the evaluation of past and present cumulative impacts on health to actionably improve past cumulative harms that continue to impact our community today. Currently, there is not enough centralized work at the federal level to remediate cumulative impacts that our community faces today. Programs like the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) establish prohibitions, requirements, and remediation for hazardous waste sites, however there are no optimized federal programs that remediate the other cumulative risks that continue to impact our families' health and quality of life. This lack of action will continue even under the framework. Again, our community faces three high traffic highways, industries, the port of embarkation, and two airports, none of which are scrutinized collectively for their impacts on our lives or remediated for their pollution impacting our health.
2. We support the inclusion of social determinants of health in this framework. Poverty, lack of education, lack of healthcare access, linguistic isolation, unemployment and poor housing conditions all contribute to health impacts in our community. Failing to address these factors in this framework and in any cumulative impacts analysis will fail to fully characterize our cumulative impacts. Including social determinants of health in impact assessments, and any framework, will ensure more accurate and focused policies that will more comprehensively address our health stressors and those around the nation while optimizing EPA's mission to protect human health and the environment.
3. We support interagency collaboration for addressing cumulative impacts. Ensuring all federal agency actions are scrutinized by their long-term and large-scale effects on health and the environment requires full agency commitment. A siloed approach from only the EPA will fail to use the resources, data, tools, frameworks, and skills from other agencies to address cumulative impacts most effectively and efficiently.
4. We do not support the optional use of this framework. Applying a fit-for-purpose approach in this framework is essential, however if this fit-for-purpose framework is only an option, our community will still face their cumulative impacts without the use of the principles and processes set forth in this framework.
5. We support the expedient and effective implementation of this framework and other frameworks for addressing cumulative impacts. Our communities currently face higher

DUWAMISH RIVER
COMMUNITY COALITION

pollution impacts than other communities near us and will continue to unless there is a centralized approach to addressing cumulative impacts. The federal government is currently failing in its mission to protect human health and the environment in the Duwamish Valley community, as numerous risk factors feed into the health discrepancies experienced. The sooner a cumulative health framework is used the sooner human health and the environment will be protected in the Duwamish Valley.

At the Duwamish River Community Coalition we aim to center community voices in decisions that affect their health. Currently, individual pollutant and risk factor thresholds at the federal level, like the NAAQS, fail to take a holistic view of our community and it is gravely impacting our quality of life, and health.

The proposed framework would begin to address the increased risk we face holistically, from our most vulnerable infants with asthma to our elderly with chronic health diseases. There are no existing frameworks that do the same. An optimized approach that is centralized by the EPA and addressed with other federal agencies may begin to contribute to the years of life lost and quality of life impacted in the DV communities by cumulative impacts.

We are thankful for the consideration!

Joseph Santana
Environmental Health Manager
Duwamish River Community Coalition
joseph@drcc.org