



Environmental Justice Overview

Project Sequoia

PREPARED FOR



ROCKWOOL

DATE

14 March 2024

REFERENCE

0642472



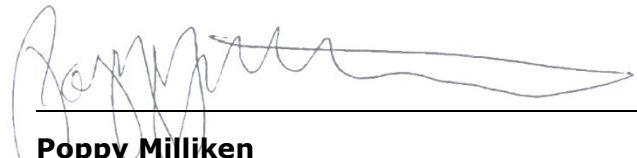
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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
Ecology	Washington State Department of Ecology
EHD	Environmental Health Disparities
EJ	Environmental Justice
ERM	Environmental Resources Management, Inc.
HEAL	Healthy Environmental for All
ROCKWOOL	Roxul, USA Inc. dba Rockwool
USEPA	United States Environmental Protection Agency



EXECUTIVE SUMMARY

This report provides an environmental justice (EJ) overview for the mineral wool manufacturing Facility proposed by Roxul, USA Inc. dba Rockwool (ROCKWOOL) that will be located at Wallula Gap Business Park in Walla Walla County, Washington.

1. WASHINGTON'S HEALTHY ENVIRONMENT FOR ALL ACT

Washington's Healthy Environment for All Act (HEAL) was passed by the Washington State Legislature in 2021. It is the first statewide law to create a coordinated and collaborative approach to EJ, making it a priority and part of the mission of key state agencies. The law requires Washington State Department of Ecology (Ecology) and other state departments to identify and address environmental health disparities in overburdened communities and for vulnerable populations. HEAL implements key recommendations from Washington's EJ Task Force, which in part, includes recommendations for equitably investing in communities experiencing the greatest health and environmental burdens and integrating EJ goals into work across the agency. Community engagement is a cornerstone of these recommendations as are the development of metrics to measure progress and conduct EJ assessments on significant agency actions.

At Ecology's request and on behalf of ROCKWOOL, Environmental Resources Management, Inc. (ERM) has included the following EJ information to give an initial look at the community demographics and where sensitive populations may be located.

2. OVERBURDENED COMMUNITIES IMPACTED BY AIR POLLUTION

To be considered an overburdened community highly impacted by air pollution, an area must meet the following conditions based on data available statewide.

1. **Community Indicators** must either have a 9 or 10 ranking on the [Washington Environmental Health Disparities \(EHD\) map](#), be in the ninetieth percentile or higher of census block groups for the [EJScreen](#) Demographic Index, or be Tribal land.
2. **Air Pollution Indicators** must have an elevated level of one or multiple criteria air pollutants.

ERM has described both the EHD map and EJScreen in more detail below.

The Climate Commitment Act requires Ecology to develop standards and strategies to reduce the criteria air pollution in overburdened communities highly impacted by air pollution. The data in the biennial reports will inform future decision-making and policy development. Pending legislative appropriation, Ecology-proposed rulemaking will develop control technology standards using existing authority under the Washington Clean Air Act. Ecology has also proposed a new grant program to target the different types of emissions sources that contribute to criteria air pollution in identified communities. Depending on legislative appropriation, Ecology would begin rulemaking and the development of a community centered grant program later in 2023.

3. PROJECT SITE DETAILS

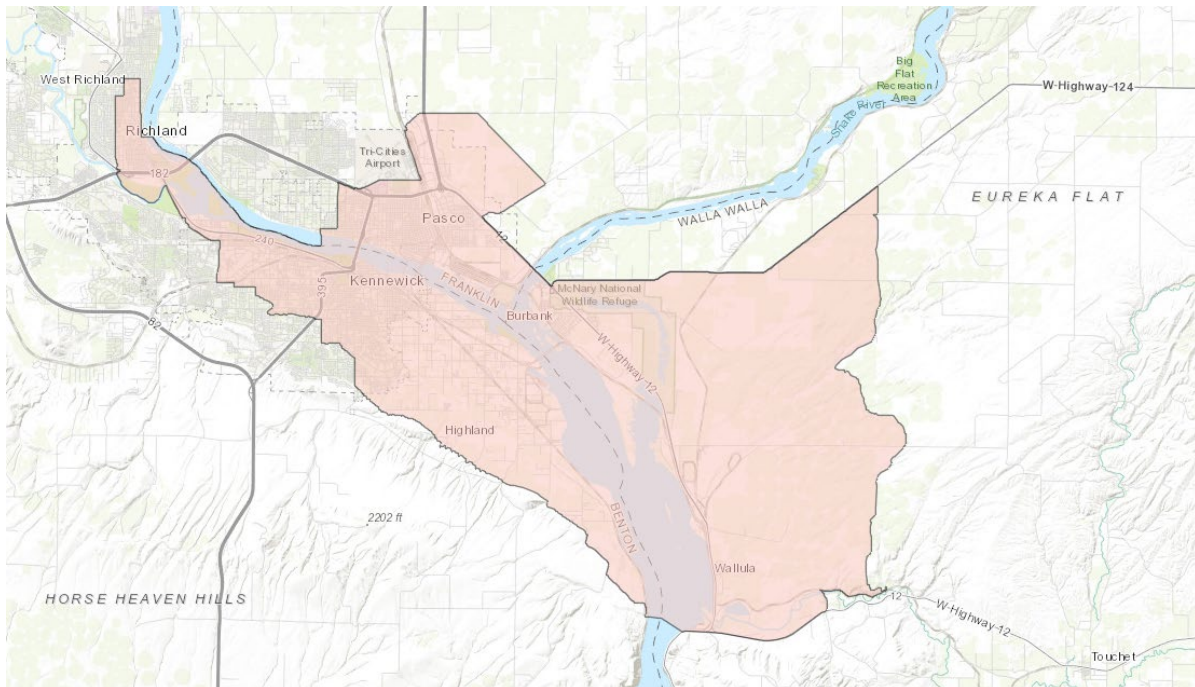
Figure 1 shows the extent of the overburdened area impacted by air pollution from the Ecology mapping tool. The whole Tri-Cities to Wallula area—about 173 square miles—has levels of fine particles, ozone, and cumulative criteria air pollution, which, when combined with poverty rates, linguistic isolation, and high incidence of asthma, can increase vulnerability to air pollution

impacts. Immediately surrounding the Site, the pollutants fall below the National Ambient Air Quality Standards.

This community met the statewide screening criteria for the Washington EHD map ranking and elevated levels of ozone, coarse particulate matter (PM 10), or, in some parts, cumulative criteria air pollution only. Most of the EJ tools show parts of Pasco and Kennewick as overburdened or disadvantaged. Some parts of the community also have higher than average prevalence of asthma and relatively lower than average life expectancy. Both the EHD map and Climate and Economic Justice Screening Tool also include part of Richland as well as the large census tract to the east of the Tri-Cities, which includes Burbank and Wallula, as highly impacted or disadvantaged. These areas were combined into one community. The large block group containing Burbank and Wallula was cut off south of Wallula Junction, as that area appears to be a wind farm and largely uninhabited.

While the community meets national ambient air quality standards for criteria air pollution, it does experience higher levels of ozone and particulate matter when compared to the rest of Washington State. This area is also subject to occasional "exceptional events" for air quality like windblown dust storms, which can lead to temporary exceedances of the National Ambient Air Quality Standards for particulate matter and unhealthy air quality.

FIGURE 1 ECOLOGY OVERBURDENED COMMUNITIES MAP



Area*	↓ Estimated Population	Size (approximate square miles)	Elevated Air Pollutants
Tri-Cities to Wallula	113,522	173	Fine particles (PM _{2.5}), ozone, cumulative criteria air pollution

4. WASHINGTON ENVIRONMENTAL HEALTH DISPARITIES MAP

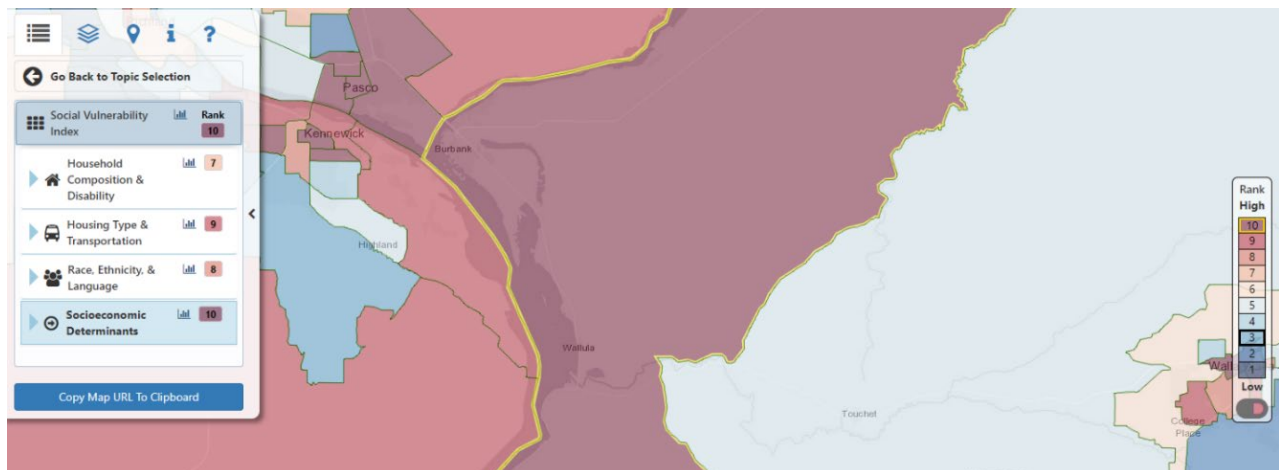
The rankings in the Washington Environmental Health Disparities Map (Map) help to compare health and social factors that may contribute to disparities in a community. Rankings should not be interpreted as absolute values, and they should not be used to diagnose a community health issue or to label a community. The following are the criteria which determine the Map's rankings.

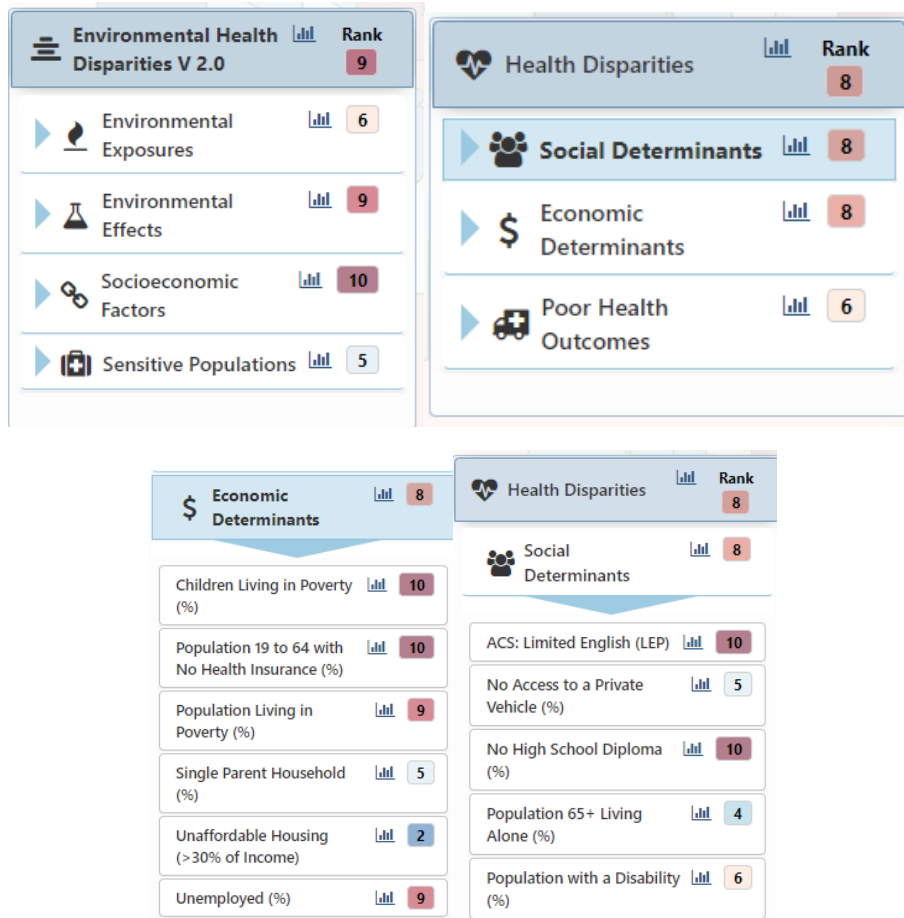
- **Health Disparities** are differences in health outcomes across population groups.
- **Social Determinants of Health** are social, economic, and environmental factors that impact health outcomes.
- **Health Inequities** are the differences in health status and outcomes across population groups that are systematic, avoidable, unfair, and unjust; these differences are sustained over time and generations, are beyond the control of individuals, and follow the larger patterns of inequality that exist in society.
- **Health Equity** exists when all people have the opportunity to attain their full health potential and no one is disadvantaged from achieving this potential because of the color of their skin, level of education, gender identity, sexual orientation, the job they have, the neighborhood they live in, or whether they have a disability.

The Map evaluates environmental health risk factors in communities. The model is based on a conceptual formula of Risk = Threat * Vulnerability, where threat and vulnerability are based on several indicators.

Figure 2 shows the map of the social vulnerabilities index for the EHD Map tool. Below the map are some of the economic, health, and environmental determinants rankings for the Census Tract where the Project Site is located.

FIGURE 2 ENVIRONMENTAL HEALTH DISPARITIES MAP





5. UNITED STATES ENVIRONMENTAL PROTECTION AGENCY EJS SCREEN

The United States Environmental Protection Agency (USEPA) EJSscreen tool provides detailed information based on the United States Census and other national data sources down to the Census Block Group level. The Project Census Block Group information shows a population with relatively low percentages of minority and low-income individuals. The EJ Indexes for the block group are ranked below the 80th percentile with the exception of the state percentile ranking for the Ozone EJ Index. The most common language spoken in the home other than English is Spanish, although linguistic isolation (percent of households in which no one age 14 and over speaks English "very well" or speaks English only [as a fraction of households]) is less than one percent of the population. ERM has provided a copy of the EJSscreen report as [Appendix A](#).

ERM has presented minority and low-income population percentages in Table 1, supplemented with two secondary socioeconomic indicators.

TABLE 1 USEPA EJSCREEN SOCIOECONOMIC INDICATORS

Percentages				
Location	Minority	Low Income	Limited English	Less than a High School Education
Washington	32%	24%	4%	8%
Walla Walla County	29%	31%	5%	12%
Site location Block Group	22%	25%	0%	7%

Source: USEPA EJ Screen

6. PUBLIC ENGAGEMENT PLANS

ROCKWOOL is committed to creating a public engagement plan with meaningful engagement to the communities in proximity to the Site while taking the potential vulnerabilities of the population into account. The HEAL Act empowers Ecology to develop and implement community engagement. This agency initiative will be kept in mind as an engagement plan is drawn up. ROCKWOOL's plans and outreach will be based on feedback from local interactions and stated needs. The EJ information ERM has gathered here is a first step by ROCKWOOL in developing an engagement plan that is flexible and responsive to local concerns. Possible needs may include the translation of Project information into Spanish, public information sessions, local community investments, and a public comment period.



APPENDIX A EJSCREEN COMMUNITY REPORT

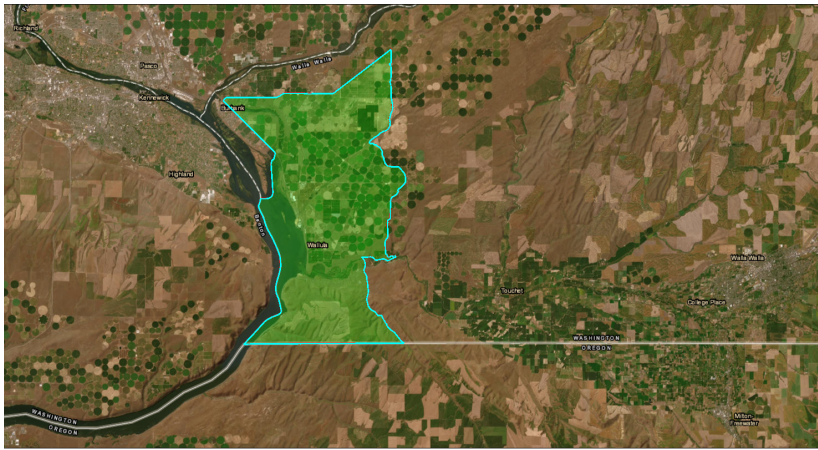


EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

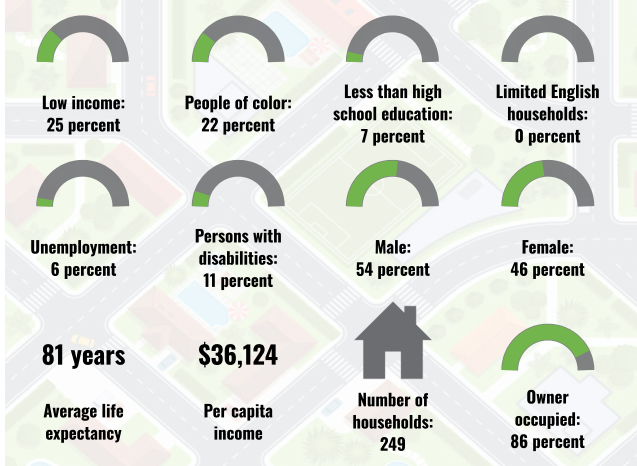
Walla Walla County, WA

Blockgroup: 53071920002
 Population: 1,031
 Area in square miles: 109.14

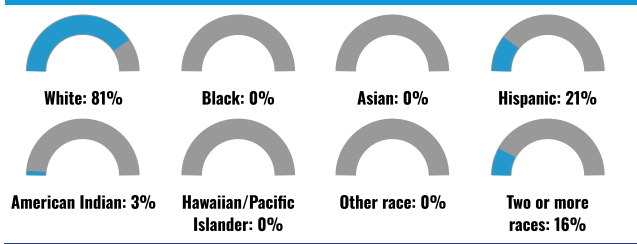


September 12, 2023
 Project 1
 1:288,895
 0 2.5 5 10 mi
 0 4 8 16 km
 State of Oregon, State of Oregon GEO, Esri, HERE, Garmin, Earthstar Geographics

COMMUNITY INFORMATION



BREAKDOWN BY RACE



LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	69%
Spanish	30%
Total Non-English	31%

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.

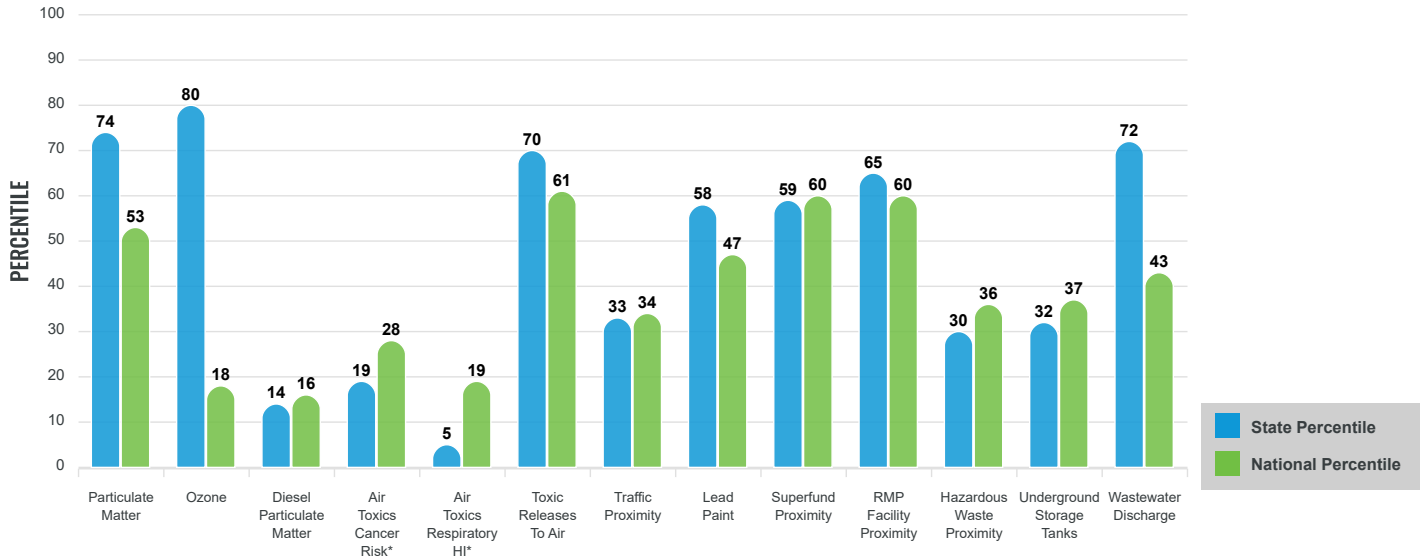
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

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.

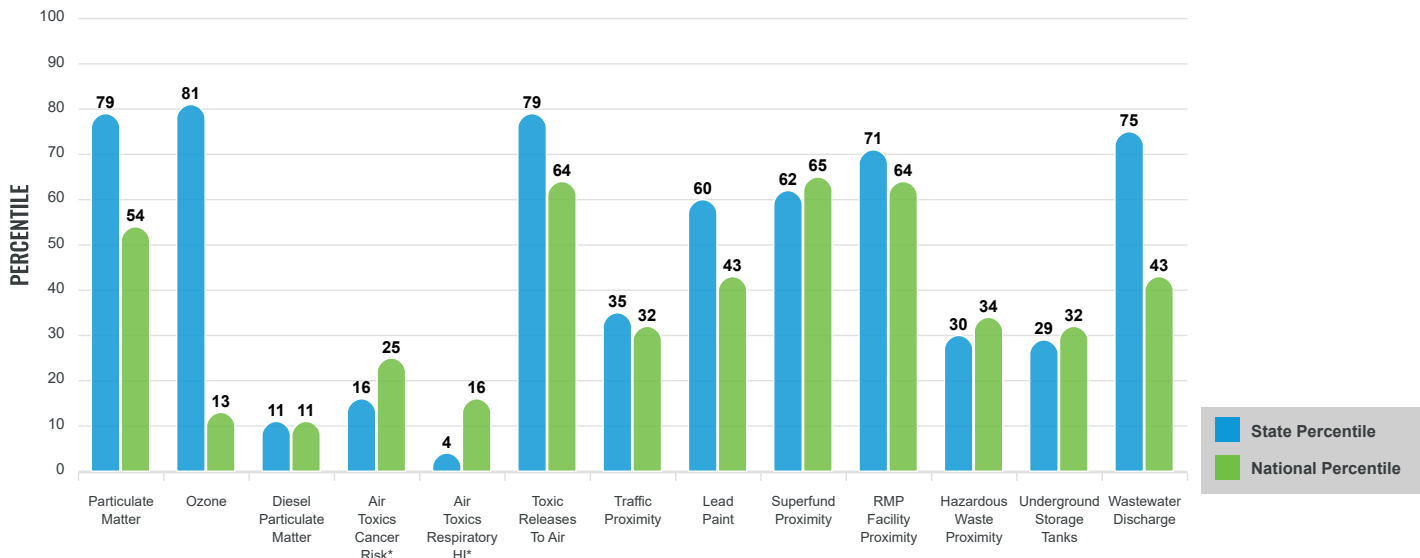
EJ INDEXES FOR THE SELECTED LOCATION



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.

Report for Blockgroup: 530719200002

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)	8.42	7.02	86	8.08	56
Ozone (ppb)	56.2	49.8	96	61.6	13
Diesel Particulate Matter (µg/m ³)	0.0837	0.355	10	0.261	11
Air Toxics Cancer Risk* (lifetime risk per million)	20	27	2	25	5
Air Toxics Respiratory HI*	0.2	0.39	1	0.31	4
Toxic Releases to Air	1,700	1,800	76	4,600	70
Traffic Proximity (daily traffic count/distance to road)	27	190	27	210	29
Lead Paint (% Pre-1960 Housing)	0.18	0.23	56	0.3	45
Superfund Proximity (site count/km distance)	0.11	0.18	55	0.13	69
RMP Facility Proximity (facility count/km distance)	0.43	0.4	74	0.43	73
Hazardous Waste Proximity (facility count/km distance)	0.16	1.6	24	1.9	30
Underground Storage Tanks (count/km ²)	0.075	6.3	23	3.9	27
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.00049	0.024	82	22	42
SOCIOECONOMIC INDICATORS					
Demographic Index	24%	28%	46	35%	40
Supplemental Demographic Index	11%	12%	53	14%	40
People of Color	22%	32%	39	39%	41
Low Income	25%	24%	60	31%	47
Unemployment Rate	6%	5%	64	6%	62
Limited English Speaking Households	0%	4%	0	5%	0
Less Than High School Education	7%	8%	56	12%	44
Under Age 5	8%	6%	78	6%	78
Over Age 64	13%	16%	44	17%	41
Low Life Expectancy	17%	18%	39	20%	29

*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	0
Water Dischargers	11
Air Pollution	3
Brownfields	0
Toxic Release Inventory	2

Other community features within defined area:

Schools	0
Hospitals	0
Places of Worship	0

Other environmental data:

Air Non-attainment	Yes
Impaired Waters	Yes

Selected location contains American Indian Reservation Lands*	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community	Yes
Selected location contains an EPA IRA disadvantaged community	Yes

Report for Blockgroup: 530719200002

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	17%	18%	39	20%	29
Heart Disease	6.8	5.3	83	6.1	65
Asthma	11.2	10.5	75	10	82
Cancer	6.2	6.3	48	6.1	50
Persons with Disabilities	9.1%	13.1%	27	13.4%	26

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	6%	11%	54	12%	48
Wildfire Risk	73%	12%	89	14%	88

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	6%	9%	50	14%	33
Lack of Health Insurance	13%	6%	91	9%	77
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Footnotes

Report for Blockgroup: 530719200002



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Ghana	South Korea
Guyana	Spain
Hong Kong	Switzerland
India	Taiwan
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