



DEC 18 2013

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The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator McCarthy:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you on your seven themes and cross-cutting issues. These represent a wide range of issues of interest and concern to local governments. We applaud your commitment to work "in concert" with state, tribal and local partners. Specifically, we would like to take this opportunity to comment on EPA's commitment to combat environmental injustice and closure of the health gap to which it contributes.

In the fight to protect human and ecological health, local governments are on the front-line and bear the burden when poor environmental quality impacts its residents. This is demonstrated in a variety of ways; some communities may be deprived of a fishable, swimmable river, and others may face elevated instances of respiratory and heart disease caused by air pollutants. In these types of situations, local governments often face significant financial and social costs of amelioration.

As representatives of our communities, the health and welfare of our citizens is paramount. Fighting to eliminate the health disparity afflicting vulnerable populations such as minorities, children, and the elderly is an important component of that responsibility especially when it relates to pollution and environmental contaminants. While local governments certainly provide more agile and flexible tools to address environmental problems than the federal government, partnership with EPA is imperative and enhances our effectiveness at the community level to protect the environment and people's health.

Thus, the LGAC presents for your consideration some of our findings and recommendations:

Reducing harmful air emissions

The LGAC appreciates EPA's efforts to reduce harmful air emissions, and is supportive of EPA's substantial efforts to monitor outdoor air and develop safety and preventive measures for indoor air quality. One example of this is EPA's Near-Roadway Monitoring program for Nitrogen Dioxide (NO₂), which also monitors other air pollutants (i.e., carbon monoxide (CO) and fine particulate matter (PM_{2.5})).

Approximately 36 million people in the United States live within 300 feet of a four-lane highway.¹ Due to the concentrated levels of automobile exhaust, living, working, or going to school near a major roadway increases the risk of asthma. Proximity to those roadways contributes to many other health conditions as well, such as cancer, allergies, respiratory illness, and heart disease.²

Because property near major roads is considered less desirable, these communities tend to be poorer and have large minority populations with significant health disparities.³ Moreover, residents of these communities tend to have less access to health care and other resources. Installing air monitors will be an important step toward understanding the environment in which these vulnerable populations are living and developing plans to enhance air quality, prevent pollution and reduce health-related risk factors. Moreover, this data will be very useful in impacted communities as another piece of critical information for planning purposes in locating community/affordable housing, in siting recreation/park facilities or for future economic development/transportation sectors.

The data can support "*communities improved access to affordable housing and transportation while protecting the environment*" as stated in the HUD/DOT/EPA Partnership for Sustainable Communities Smart Growth program. One example of this is the City of Denver, Colorado installation of air monitors to gain important information on vulnerable populations and developing plans to enhance air quality, prevent pollution and reduce health-related risk factors.⁴

The LGAC especially commends EPA's emphasis on the partnership between federal, state, and local governments, as demonstrated by the pilot study for the monitoring program. Regional Administrators are more familiar with the unique local specifics of a given area than officials in Washington, D.C. and thus are better situated to work closely with state and local governments as they develop NO₂ monitoring plans. The LGAC also supports EPA's requirement for states to include CO and PM_{2.5} monitors at these near-roadway sites in certain cities.

¹ US Census Bureau. American Housing Survey for the United States: 2005.

² Kim JJ, Huen K, Adams S, et al. 2008. Residential Traffic and Children's Respiratory Health. Environ Health Perspect. 2008

³ American Lung Association. <http://www.stateoftheair.org/2013/health-risks/health-risks-disparities.html>

⁴ See <http://www.colorado.gov/airquality/report.aspx>

The Committee appreciates the Agency's March 7, 2013, revision to the timeline for near-road monitors for NO₂ to be operational. By staggering the deadlines based on population, regions are able to work together to address those areas most in need first; in these hard economic times, this fiscal consideration is essential for local governments to meet the rule's requirements.

Recommendation: The LGAC recommends delegating the authority to approve states' annual NO₂ monitoring network plans to EPA Regional Administrators. This will help to foster greater cooperation with state and local governments and a culture of regionalism.

Recommendation: The LGAC recommends that EPA provide educational information to raise the awareness of the easily-accessible tools to reduce exposure to harmful air emissions. EPA should empower communities with tools for citizens to help protect their own health. The LGAC believes that EPA could put together a "menu" of easy, achievable ways to decrease one's exposure to NO₂ and other harmful pollutants near roadways. Furthermore, EPA should provide this information with particular attention paid to Title VI Limited English Proficiency issues in mind.

Cumulative Risk and Health Disparities

In assessing health impacts by pollution EPA should consider cumulative risks for environmental risks in EJ communities because of disparities in health, healthcare access, social and economic determinants⁵. In these vulnerable populations, pollution and environmental impacts affect health through multiple and cumulative stressors such as access to care, being insured, living conditions, nutrition, and socio-economic determinants. These cumulative risks compound the effects of environmental contaminants and pollution⁶.

Recommendation: EPA should consider multiple stressors in addition to the contaminant's effects when evaluating risks for vulnerable populations.

In summary, the Committee believes that your seven themes for EPA provide an excellent framework for cooperation between the federal government and local governments. By partnering with states, local governments, and communities, EPA can help ensure a safe and healthy environment for years to come. We are committed to assisting you and the agency, through our advisory role, to make real achievements in addressing environmental problems in all communities.

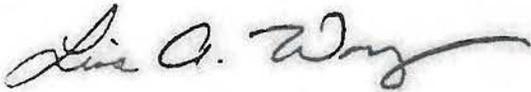
⁵ Schwartz, Joel, PhD, David Bellinger, PhD and Thomas Glass, PhD, Expanding the Scope of Risk Assessment: Methods of Studying Differential Vulnerability and Susceptibility. American Journal of Public Health, Supplement 1. 2011, Vol. 101, No. S1, S102-S109.

⁶ Schwartz, Joel, PhD, David Bellinger, PhD. and Thomas Glass, PhD. Exploring Potential Sources of Differential Vulnerability and Susceptibility in Risk From Environmental Hazards to Expand the Scope of Risk Assessment. American Journal of Public Health, Supplement 1. 2011, Vol. 101, No. S1., S91-S101.

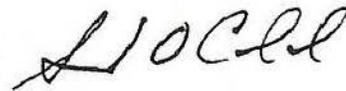
Sincerely,



Mayor Bob Dixon
Chair, LGAC



Mayor Lisa Wong
Chairwoman, Expanding
the Conversation (EJ) Workgroup



Supervisor Salud Carbajal
Chair, Air, Climate & Energy Workgroup