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October 10, 2024

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan:

The Local Government Advisory Committee (LGAC) is pleased to submit recommendations for the EPA Region 5 Community Action Roadmap. We appreciate the efforts that the Agency has taken to work with communities to assist in the development of place-based tools and approaches to help reduce disproportionate and cumulative impacts. Building upon the groundwork laid out in the Roadmap, the LGAC offers a set of recommendations that can 1) strengthen the EPA's overall strategy to address cumulative impacts; 2) promote local collaboration and partnerships; and 3) advance implementation in site-specific situations.

We recommend that the EPA:

- Take steps to mitigate cooption and ensure impacted communities lead the process in navigating the Community Action Roadmap;
- Clarify the scope and use of the Roadmap to ensure customizability;
- Facilitate local government buy-in and effective communication for successful roadmap implementation;
- Connect local governments and community organizations to potential funding sources;
- Facilitate forums and workshops for local governments;
- Provide technical assistance for quantitative analysis; and
- Assist in scoping policy solutions.

More details about these recommendations are included below. We thank you for the opportunity and look forward to continued engagement and collaboration with the EPA to advance environmental justice nationwide.

Sincerely,

Mayor Leirion Gaylor Baird   Harris County Attorney Christian Menefee
LGAC Chair   LGAC Environmental Justice Workgroup Chair

LGAC Recommendations for EPA's Community Action Roadmap on Addressing Cumulative Impacts in Overburdened Communities

Introduction

Environmental Protection Agency (EPA) Region 5 has created a "Community Action Roadmap" as a holistic, cross-program, community-driven strategy to tackle "cumulative impacts"—the totality of exposures (public health and/or environmental effects, in a geographic area) to combinations of chemical and nonchemical stressors and their effects on health, well-being, and quality of life concerns.

The Roadmap provides a structured plan, with resources and best practices, for local governments to work with community partners—the people who live with the compounding effects of environmental injustice daily—to address the combined effects of multiple sources of pollution. The Roadmap addresses engaging with communities, collecting and analyzing data, and developing effective policies to reduce environmental harm.

The Roadmap is a six-phase, iterative process designed to foster authentic community engagement and cross-program collaboration, promoting sustainable environmental justice initiatives. It starts with screening to identify areas with potential environmental justice concerns, followed by scoping to define assessment goals. The assessment phase involves a detailed analysis of identified issues, leading to the formulation of recommendations. These recommendations are then documented and communicated in the reporting phase, and finally, the monitoring phase ensures ongoing evaluation and adjustment.

EPA has sought the Local Governmental Advisory Committee's (LGAC) input as it prepares to roll the Roadmap out nationally. EPA posed the following charge questions:

- How can the Community Action Roadmap be a vehicle to advance EPA's overall strategy to assess and address the multiple and cumulative impacts which disproportionately affect historically marginalized communities?

- How can EPA utilize the Community Action Roadmap to promote local government partnerships with their communities, other federal agencies, and state governments?

- What input does LGAC have to refine Region 5's Community Action Roadmap Standard Operating Procedures?

- How can local governments partner with EPA to advance implementation of the Community Action Roadmap in site-specific situations?

- How can EPA promote national use of the Community Action Roadmap across its programs and regions?

The following recommendations address those charge questions.

<p style="text-align:center">***</p>

Mitigate Cooption and Ensure Impacted Communities Lead the Process. EPA should take steps to prevent the cooption of the Roadmap by groups or local governments that lack a genuine commitment to addressing cumulative impacts in a manner that benefits impacted communities. Before a local government even begins using the Roadmap, a shared concept of "environmental justice" should be discussed to ensure that there is unified understanding and vision of environmental justice. The decision to address cumulative impacts should be led by the communities most affected. This ensures that the process aligns with the actual needs and priorities of those communities. Some communities may be concerned that the use of the

Roadmap could lead local governments to identify issues without allowing them to take the lead, resulting in solutions that are imposed rather than collaboratively developed. Such an approach could generate unhelpful or even harmful outcomes, with local governments pushing forward with initiatives that fail to address core concerns or exacerbate existing problems. To avoid this, it is crucial that impacted communities not only be consulted but positioned as the primary decision-makers regarding whether and how the Roadmap should be used.

When implementing the Roadmap it is essential that all participants have a common understanding of how decisions will be made especially which entity has the ultimate decision-making power. If the decision-making process is not clear at the onset of the process partners can lose trust in governmental leaders. For example, in New Jersey, community leaders asserted a city completed a Health Impact Assessment with community groups and opted to implement the most cost effective strategy that did not align with the strategy decided by the group (see [City of Hoboken, New Jersey Proposed Stormwater Management Plan Health Impact Assessment (HIA)](#)).

When local governments implement the Roadmap, environmental justice community leaders must be fully integrated into the process as key decision-makers, not as peripheral actors providing feedback that may never be implemented. EPA should establish clear criteria for what constitutes meaningful engagement and work in this space, ensuring that local governments using the Roadmap are authentically collaborating with and empowering representatives of overburdened communities.

Clarify the Scope and Use of the Roadmap and Ensure Customizability. The scope of the Roadmap as it currently stands is unclear, and it may be too dense for many local governments—and their community partners—to work through effectively. EPA should clarify its purpose by developing clear guidelines on how to use the Roadmap. This includes outlining the ideal number of people to use it, the types of local governments best suited to adopt it, and providing real-world examples to help users see themselves in the process. Creating these guidelines can address concerns about user readiness and ensure that governments can engage with the tool effectively, regardless of their starting point.

EPA should also ensure the Roadmap is presented in layman's terms and in an easily accessible form, such as an online dashboard. It should also incorporate a stakeholder checklist to guide local governments in engaging key groups, including community organizations, industry representatives, labor groups, local government departments, and state officials. Furthermore, EPA should offer guidance on how local governments can effectively identify and evaluate community organizations for inclusion in the process.

Moreover, the final Community Action Roadmap must be customizable to accommodate the unique needs of jurisdictions with varying population sizes and capacities. Different local governments will have different considerations when deciding the scope of their cumulative impact assessments. Some may need to focus on specific issues like air quality or industrial pollution, while others may need to address a broader range of environmental and health concerns. Additionally, the level of resources and expertise available can vary significantly between small towns and large metropolitan areas. To address these variations, EPA should ensure that the roadmap includes adaptable modules and scalable strategies that can be tailored to the specific contexts of different communities. The Roadmap should also include guidance on how to prioritize actions based on local conditions and available resources. By offering templates, checklists, and case studies that highlight diverse approaches, EPA can help local governments customize their plans effectively.

The Roadmap should also include a self-assessment component to allow local governments to evaluate their capacity to effectively implement the outlined initiatives and identify any necessary adjustments or additional resources required to enhance their readiness and ensure successful outcomes.

Facilitating Local Government Buy-In and Effective Communication for Successful Roadmap Implementation. For the Roadmap to be effective, local governments must fully commit to environmental

justice principles. Unfortunately, this is not always the case, as not all local governments share the same level of awareness or commitment to these issues. EPA should facilitate buy-in from local governments by crafting messaging that highlights the benefits of engaging with the Roadmap, such as improving community health, fostering economic development, and reducing long-term environmental risks.

Local governments seeking to partner with impacted communities on a cumulative impact assessment must be able to effectively communicate about the Roadmap. EPA should provide message crafting and talking points to help local governments engage with communities effectively. These resources should emphasize the importance of community involvement from the outset, allowing residents to share their experiences and contribute to the decision-making process. Additionally, providing multilingual resources and ensuring accessibility for all community members, including those with disabilities, can enhance engagement and participation.

EPA can offer examples of successful public engagement strategies and provide communications and public relations support to help local governments clearly convey the issues, the assessment process, and proposed solutions. These examples can include case studies, templates for public meetings, and guidelines for utilizing social media and other digital platforms effectively. By equipping local governments with these tools, EPA can help them to present information transparently, address community questions and concerns proactively, and highlight the benefits of proposed actions. By empowering local governments with effective communication tools, EPA can help build trust and foster a sense of ownership among community members, ultimately leading to more successful and sustainable outcomes.

Connect Local Governments and Community Organizations to Potential Funding Sources. Local governments—and their community partners—seeking to use the Community Action Roadmap to assess and address cumulative environmental impacts may face significant costs. These governments may be faced with undertaking extensive collection and analysis of pollution and health data, engaging with communities and industries, and navigating various state and local agencies to craft effective solutions. These activities are resource-intensive, requiring substantial financial and human capital. The burden can be particularly heavy for smaller municipalities with limited budgets and staff. It is crucial that local governments have access to adequate funding to support these essential activities. It is also imperative that the community organizations in these jurisdictions have access to funding opportunities to facilitate their partnership in the Roadmap process.

The federal government has various funding sources that could support this work, yet these opportunities are frequently scattered across different agencies and programs, making it challenging for local governments and community organizations to identify and apply for them. The EPA should compile these funding opportunities into a centralized, accessible resource for local governments and community organizations. The EPA should also ensure local governments are connected with the EPA's Environmental Justice Thriving Communities Technical Assistance Centers (TCTAC), which provide local governments assistance with grant writing, grant management, and other services integral to pursuing federal funding.

Facilitate Forums and Workshops for Local Governments. EPA should facilitate collaborative forums and workshops for local governments to share best practices, experiences, and strategies for utilizing the Roadmap. These forums would provide opportunities for local officials to familiarize themselves with the roadmap, learn from one another, discuss challenges, and develop solutions.

EPA could host workshops to provide hands-on training and technical assistance, helping local governments build the capacity to conduct cumulative impact assessments effectively. These workshops can cover a range of topics, from data collection and analysis techniques to community engagement strategies and policy development. Moreover, EPA can incorporate ongoing support to address challenges that emerge as local governments work through the Roadmap. EPA employing this proactive approach can lead to more resilient and sustainable communities, as local governments become better equipped to mitigate environmental risks and protect public health.

Provide Technical Assistance for Quantitative Analysis. Obtaining detailed quantitative data is essential for identifying overburdened neighborhoods and understanding the extent of cumulative impacts. EPA should provide technical assistance to local governments in using tools like EJSCREEN and navigating data platforms. This assistance can include training sessions, real-time support, and connections to academic experts who can help identify and obtain relevant data points. By guiding local officials in interpreting and applying data, EPA can ensure that assessments are grounded in robust and accurate information. This foundational support can help local governments pinpoint specific areas of concern and develop targeted interventions to address environmental and health disparities effectively. Additionally, EPA should connect local governments with any of its existing services—including the TCTAC Program— for advanced quantitative data analysis. TCTAC centers, for example, may be able to offer specialized expertise and resources, enabling local governments to conduct sophisticated analyses that might otherwise be beyond their capacity.

By offering robust technical support, EPA can enhance the capacity of local governments to conduct thorough and accurate cumulative impact assessments. This will lead to more informed decision-making and more effective strategies for mitigating environmental injustices.

Assist in Scoping Policy Solutions. Local governments using the Community Action Roadmap need to determine which policy areas they have the legal power to control and which local agencies can help create effective solutions. For example, if a local government has no control over zoning and permitting, it will need to understand those limitations as it crafts solutions to address cumulative impacts. EPA should provide guidance on conducting legal analyses, identifying relevant local government departments, and coordinating efforts across multiple agencies. This support can include detailed instructions on how to conduct comprehensive legal reviews to ensure proposed actions comply with local, state, and federal regulations. Additionally, EPA can offer frameworks for mapping out the jurisdictional landscape, helping local officials understand the scope of their authority and the roles different departments and agencies can play in the implementation of the roadmap.

This support can include best practices for integrating housing, zoning, health, transportation, solid waste, and environmental policies into a cohesive strategy. By providing examples of successful policy integration from other communities, EPA can offer a blueprint for local governments to follow. Further assistance can include workshops and webinars on policy development and inter-departmental coordination, featuring experts in public policy and environmental law. By helping local governments navigate the complex policy landscape, EPA can facilitate the development of effective, legally sound solutions to address cumulative impacts. This comprehensive approach ensures that all relevant sectors are aligned and working towards common goals, ultimately leading to more robust and sustainable community action plans. Additionally, fostering collaboration across departments can enhance resource sharing and create synergies that amplify the effectiveness of individual policies.