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December 11, 2015

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 this opportunity to work with you to provide constructive feedback on the implementation and goals set forth in *Plan EJ 2020*. We commend your efforts to further *Plan EJ 2014* with the new *Plan EJ 2020*, the draft of which was released in June (2015) with the aim of protecting "the health and environment of overburdened communities, support them to take action to improve their own health and environment, and build partnerships to achieve community health and sustainability." With the input and recommendation of local government officials, we hope to improve *Plan EJ 2020* even further.

Local governments are the front line of implementation of regulation, but they must also balance the needs and views of the community. Intergovernmental collaboration with the EPA and state governments regarding *Plan EJ 2020* is of huge importance to bringing about meaningful dialogue between local governments and the communities they serve and improving our environmental and social climate. The LGAC recommends the incorporation of the following:

Recommendation: Integrate cumulative risks and impacts as critical public health concerns when considering pollution in particular for communities with EJ concerns, particularly small, rural and tribal communities. The EPA should continue to examine cumulative risks and impacts related to health disparities in communities with EJ concerns such as with establishing air quality standards, emission standards for refineries and other issues.

Recommendation: The LGAC recommends that the EPA consider that new EPA employees receive mandatory EJ training and that all

employees participate in annual training regarding updates and/or new developments in EJ issues. Having a workforce that is aware of the environmental justice issues faced in communities allows for EPA's active participation in helping to alleviate EJ concerns.

Recommendation: The LGAC supports the EPA to continue to actively consider EJ impacts in rulemaking. For example, The LGAC recommended, among other recommendations at its March 2015 meeting, that the EPA consider and use an EJ Analysis on proposed future rule-makings.

The LGAC believes that providing resources to low-income, minority, and rural communities and integrating environmental justice into EPA rulemaking is crucial to make effective environmental protection policies even more beneficial. To that end, the LGAC recommends that the EPA always collaborates with local governments on tools and mechanisms to aid EJ communities, in particular emphasizing culturally appropriate materials to improve levels of communication and outreach, such as bilingual literature and translations of rules for the affected communities.
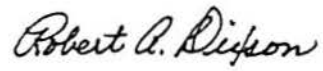
Recommendation: The EPA should also actively pursue more funding opportunities for EJ communities, both within the Agency and in collaboration with other federal agencies. Also, if EJ communities run successful programs using a grant, that funding should be continued for a period after that to strengthen the program, and to ensure its sustainability, especially when such programs could be replicated in other communities. Environmental justice communities often lack the administrative capabilities to identify funding sources, managing grants, and reporting and monitoring of grants. They need assistance in building this capacity, which can lead to greater resiliency and improved human and environmental health of these communities. This is especially effective when partnered with clear communication to EJ communities in a user-friendly format such as multi-lingual options.

Recommendation: The EPA should continue to seek partnerships with state and local agricultural committees. For example, in addition to EPA EJ tools such as E-enterprise and EJ screen, the New York City Department of Health Environmental Health and Quality Community Online Portal[1] is a useful resource that has the capability of reaching an additional 8.5 million people.
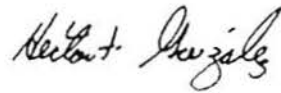
We appreciate the opportunity to review *Plan EJ 2020*. The LGAC commends the EPA, and you, Administrator McCarthy, for your continued efforts to collaborate with local governments and tribal leaders and advance environmental justice across the nation.

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[1] City of New York. New York City Department of Health Environmental Health and Quality Community Online Portal http://www.nyc.gov/html/doh/html/environmental/tracking.shtml

Sincerely,

Mayor Bob Dixson
Chairman

Dr. Hector Gonzalez, M.D., M.P.H.
Chairman, Environmental Justice (EJ)
Workgroup

Commissioner Robert Cope
Chairman, Small Community Advisory
Subcommittee (SCAS)