

**Great Lakes Advisory Board Subcommittee
Draft Environmental Justice Comments
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Participants:

Naomi Davis, Blacks in Green

Molly Flanagan, Joyce Foundation

Simone Lightfoot, NAACP

Matt Thompson, Environmental Resources Coordinator – Saint Regis Mohawk Tribe

Great Lakes Restoration Initiative's Relationship to Environmental Justice

The Great Lakes Restoration Initiative (GLRI) touches upon many issues of concern to environmental justice communities and communities of color. There are obvious environmental justice links for GLRI focus areas 1 (Toxic Substances and Areas of Concern), 3 (Nearshore Health and Nonpoint Source Pollution), and 5 (Accountability, Education, Monitoring, Evaluation, Communication, and Partnerships). Toxic hot spots like Areas of Concern often occur in urban areas where there is a legacy of industrial pollution and sometimes continuing pollution. Fish consumption advisories and drinking water contamination hit environmental justice especially hard. Communities that depend on the lakes and their tributaries as a source of protein through subsistence fishing are impacted by contaminated fish. Many native tribes rely on fishing in the Great Lakes and their tributaries for cultural reasons as well as economic reasons.

Definition of Environmental Justice

Environmental Justice is defined by the Environmental Protection Agency Office of Environmental Justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Fair treatment means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.

Meaningful Involvement means that:

- people have an opportunity to participate in decisions about activities that may affect their environment and/or health;
- the public's contribution can influence the regulatory agency's decision;
- their concerns will be considered in the decision making process; and
- the decision makers seek out and facilitate the involvement of those potentially affected.

Benefits to Including Environmental Justice in the Great Lakes Restoration Initiative:

More careful consideration of environmental justice issues and communities would demonstrate the incorporation of Executive Order 12898 - Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income

Populations. This order is designed to focus Federal attention on the environmental and human health conditions in minority communities and low-income communities with the goal of achieving environmental justice. It is also intended to promote nondiscrimination in Federal programs affecting human health and the environment and to provide minority and low-income communities access to public information on, and an opportunity for public participation in, matters relating to human health or the environment. Including environmental justice issues and communities in the GLRI would also help implement the EPA's 2011-2015 Strategic Plan and its Plan EJ 2014 commitment. Plan EJ 2014 is EPA's overarching strategy for advancing environmental justice. It seeks to:

- Protect health in communities over-burdened by pollution;
- Empower communities to take action to improve their health and environment;
- Establish partnerships with local, state, tribal and federal organizations to achieve healthy and sustainable communities.

In 2014, EPA will make an assessment of its progress in achieving the goals of Plan EJ 2014. Based on this assessment, EPA will produce a report on the accomplishments, lessons learned, challenges, and next steps for continuing the Agency's efforts to make environmental justice an integral part of every decision. This plan could be helpful in guiding GLRI work from 2015-2019.

Better incorporating the concerns of environmental justice communities in the Great Lakes Action Plan and Great Lakes Restoration Initiative would:

- Recognize a broadening recognition that certain communities in the Great Lakes Region bear disproportionate consequences from water pollution and other environmental hazards;
- Demonstrate that the GLRI should consider broad environmental dynamics and the EPA deliberately sought, welcomed and vetted a healthy dialogue of solutions related to environmental justice concerns;
- Demonstrate that EPA recognizes environmental justice goals, processes and procedures already taking place in the region including at the very local level;
- Demonstrate the value EPA places on policies, practices, findings and lessons learned across the region (state and local environmental justice plans, etc.);
- Provide opportunities to incorporate the environmental justice work of the regions highly regarded institutions of higher learning including the University of Michigan and others;
- Demonstrate consideration and/or inclusion of scientific, human health, historical, social, legal, cultural and political complexities of the relationship between people, the Great Lakes and the environment;
- Acknowledge that environmental problems influence and impact Great Lakes problems across local, regional, national and international boundaries;
- Demonstrate EPA's commitment to ensure at each opportunity possible, the EPA's overarching strategy for advancing environmental justice protects the environment and health in overburdened communities, empowers communities to take action to improve their health and environment, and establishes partnerships with local, state, tribal and federal governments and organizations to achieve healthy and sustainable communities.

Recommendations

We recommend that GLRI grant scoring/ranking be revised to reflect the desire to engage environmental justice communities in projects in those communities. This type of priority/ranking should be given to all projects that will effectively engage environmental justice communities even if the project takes place outside of an environmental justice community. By making this a requirement, it is more likely to achieve meaningful engagement and make it much harder for applicants to simply check a box or say it tried and move on.

GLRI projects proposed in environmental justice communities/communities of color should involve those communities in the planning and execution of those projects. Project applicants need to find meaningful ways to engage the communities in which they propose to work. We would like to see this required of all applicants in environmental justice communities. This could mean subcontracting to on-the-ground community organizations to help with community engagement and ensuring that community voices are brought to the table during the planning phases and implementation of the project.

The GLRI RFP should encourage partnerships with organizations based in communities of color. This is different from partnerships with organizations that say they serve communities of color, but may not be based in the community.

We recommend that environmental justice communities and their concerns be better incorporated into the GLRI. Projects requesting GLRI funds in environmental justice communities should do the following:

- A process and method to incorporate environmental justice principles and goals and a process to monitor implementation;
- An environmental justice assessment;
- A community action and empowerment component to improve environmental and human health;
- For related projects, positively impact water affordability, access and address pollution caused by combined sewer systems;
- Establish broad partnerships with local, state and tribal governments;
- Positively influence environmental justice outcomes through the permitting process including tools to help ensure permitting authorities make environmental justice informed decisions;
- A process to identify and capture the scalable and replicable elements of successful efforts to engage environmental justice communities. This information should be captured and shared through EPA's website and other venues. GLRI grantees should be required to include information in grant reports that will help future proposals learn about practices and methods that work for engaging EJ communities. This could include telling the stories of successful projects in EJ communities. It would ensure that urban faces and EJ faces are posted on websites and included in success stories;
- Encourage youth involvement. EPA should look at opportunities to encourage organizations that are funded thru the GLRI to engage young people in communities of color. This would provide safe places for young people to learn about green work

and learn skills that could be valuable to them in the future. It would engage them in taking care of environmental and human health;

One potential goal for GLRI projects in environmental justice communities should be to leave community organizations in better shape than when the project began.

We all have a responsibility to ensure that no communities are left out of efforts to protect and restore the Great Lakes. This responsibility is greater in communities that have shouldered a disproportionate amount of contamination and the negative health impacts of environmental pollution. We see clear ways that the GLRI could better incorporate environmental justice concerns and communities into every aspect of its programming. This includes the Great Lakes Action Plan, the GLRI RFP, and grant reporting requirements. We appreciate your consideration.