February 18, 2025

Public Comment in response to Docket ID No. EPA-HQ-OLEM-2024-0360

Introduction

As a resident of Baltimore, Maryland and a graduate student studying Public Health with a concentration in Health Equity, I offer the following public comment in response to the recently released Environmental Protection Agency (EPA) Interim Framework for Advancing Consideration of Cumulative Impacts, from the perspective of a concerned citizen and a future public health professional. According to the EPA, cumulative impacts are defined as the sum of exposures to both chemical and non-chemical stressors and their effects on an individual's health, wellness, and quality of life (US EPA, 2024). With this in mind, I am primarily concerned with the disproportionate burden of cumulative impacts on historically underserved communities including racial and ethnic minorities and individuals in rural and low-income communities. All of these groups have been subject to environmental slavery, the systematic destabilization of marginalized communities through the intentional concentration of polluting industries and deprivation of the associated socioeconomic benefits (Wilson, 2010). With the Interim Framework, the EPA has an opportunity to create and enforce regulations that protect against environmental slavery and focus on cumulative impacts evaluation and prevention strategies. Toward this objective, I am supportive of a standardized approach that seeks to operationalize the analysis of cumulative impacts.

General Comments

In brief, the Cumulative Impacts Assessment Guidelines is succinct, inclusionary, and comprehensively researched.

Broad community definition is a foundational component. The definition of communities is broadly defined to include "individuals, geographically defined communities, or definable population groups or lifestages" (*Interim Framework for Advancing Consideration of Cumulative Impacts*, 2024). The adoption of this broader definition creates an opportunity to be more inclusive of and meaningfully engage those most at-risk. It also recognizes the complexities of an individual's personhood and its interaction with stressors. Pertinently, as residential zip code influences life expectancy due to the historically entrenched disparities present in many communities the intersectionality of those who have overlapping exposure should also be considered (Biden Administration, 2021).

Systematic Approach. The guidelines outline a four-step evaluation process that culminates in an informed decision. As an analysis by the Institute of Medicine (2014) notes, social justice movements rely on building a narrative, organizing, and the mobilization of structures. The development of the cumulative impact assessment

guideline is both timely and in alignment with the aforementioned guiding principles. This positions the guidelines to create widespread and transformational change.

Major Concerns

Notwithstanding, there are a few notable concerns for consideration in strengthening the guidelines.

Meaningful Community Engagement. While meaningful engagement transcends all steps of the evaluation process the broad scope of feasibility could have a contradictory effect. The noted feasibility considerations include vague circumstances such as court-ordered deadlines, a lack of resources, and lead time. Given that the groups most at-risk of experiencing negative effects due to cumulative impacts also most likely have a history of medical mistrust, successful community engagement is paramount. Researchers at the University of Maryland Center for Health Equity conducted community-based participatory research which allowed them to successfully build and maintain community partnerships through the use of multiple innovative approaches including the development of an advisory board, the adaptation of interventions to fit within short interactions, and prioritization of bidirectional support (Thomas et al., 2022).

Demonstrating Transparency. According to the Centers for Disease Control and Prevention (CDC, 2024), health literacy is defined as an individual's ability to access, understand, and utilize information and services to make informed health-related decisions. To that end, in all phases of assessment simple and digestible summaries providing reasoning behind decisions should be provided in lay language online and in-print. The importance of maintaining this level of transparency cannot be understated and will be integral to the legitamacy of cumulative impacts assessments. To give an example, researchers at the University of New Mexico studying abandoned uranium mines on Navajo Nation lands identified linguistic and cultural barriers with the Navajo language not having words for certain chemicals (Velasco, 2022). To address this, the researchers created a Navajo Health Dictionary and commissioned a local artist to create tribal art illustrating research concepts. This action improved health literacy by providing critical information to Navajo tribal members in their native language and lends itself to transparency and reproducibility allowing others to build upon this evidence base. At this juncture, fostering a commitment to transparency is critical.

Summary

In summary, the Interim Framework has significant potential to guide EPA staff and decision makers to act urgently to address cumulative impacts. In investing in the development of a comprehensive framework the EPA has upheld its fourth foundational principle, to advance justice and equity (EPA, 2021). The next iteration should expand

upon the current processes and particularize the EPA's legal enforceability of the cumulative impacts assessments and identify gaps that can be filled by local and state decision-makers.

Thank you in advance to the EPA for their consideration of the aforementioned comments.

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