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To: U.S. Environmental Protection Agency (EPA)
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Subject: Comments on Interim Framework for Advancing Consideration of Cumulative Impacts
Docket ID: EPA-HQ-OLEM-2024-0360

Pacific Environment appreciates the opportunity to offer our comments on the Environmental Protection Agency's (EPA) Docket ID No. EPA-HQ-OLEM-2024-0360 Interim Framework for Advancing Consideration of Cumulative Impacts. Pacific Environment is a non-profit working to confront our most urgent environmental issues by connecting local and global movements, catalyzing policy change and inspiring action for the benefit of people and our planet.

Pacific Environment supports EPA's development of a framework for consideration of cumulative impacts.

The EPA's framework for addressing cumulative impacts is an improvement over the current approach, which has been ineffective because it involves setting standards and assessment for individual pollutants without considering the health effects from multiple exposures. Many communities around the country are living amongst multiple polluting industries and face exposure to multiple toxic chemicals. Unsafe and compounding, these impacts lead to multigenerational toxic exposures that impact not only current but future generations. We commend the EPA's Interim Framework as a positive step to address cumulative impacts, and would like to highlight the following points:

1. **Ensuring effective operationalization of cumulative impact assessment within the EPA.**

We support two specific recommendations included in the EPA OIG report "The EPA Needs to Further Refine and Implement Guidance to Address Cumulative Impacts and Disproportionate Health E□ects Across Environmental Programs" published in August 2023. Namely:

1) Increase and improve coordination between EPA programs to assess and address cumulative impacts in Agency decision-making, programs, policies, and activities; and,
2) Develop and implement performance measures to monitor progress in identifying and addressing cumulative impacts across EPA programs.

The Framework should clarify how EPA will address the above recommendations to develop and implement cumulative impact assessment performance measures, internal coordination, and monitoring.

2. Community involvement must be prioritized to operationalize this framework.

We additionally want to emphasize that given the points mentioned above, in order for the EPA to properly conduct a cumulative impact assessment for a given area, they must understand the full context of environmental injustice experienced by residents in that area including social determinants of health indicators, such as access to health care. In order to do this effectively, community involvement from the first stages of implementation is critical.

A variety of tools and methods of outreach must be utilized to maximize public participation. This should include providing translation services in community languages, accessible communication demonstrating that residents have essential lived expertise, and otherwise reducing as many barriers as possible for participation.

We would again like to thank the EPA for the opportunity to comment on Docket No. Docket ID No. EPA-HQ-OLEM-2024-0360 Interim Framework for Advancing Consideration of Cumulative Impacts.

Respectfully,

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