AMERICAN PUBLIC HEALTH ASSOCIATION
For science. For action. For health.

February 12, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
William J. Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Comment on EPA's Interim Framework for Advancing Consideration of Cumulative Impacts (Docket ID: EPA-HQ-OLEM-2024-0360)EPA-HQ-OLEM-2024-

Dear Administrator Zeldin:

On behalf of the American Public Health Association, a diverse community of public health professionals who champion the health of all people and communities, I write to commend the U.S. Environmental Protection Agency for its commitment to addressing cumulative impacts on health and the environment by releasing the Interim Framework for Advancing Consideration of Cumulative Impacts. These comments were developed in collaboration with members of the association's Environment Section.

Through its work, APHA advocates for policies and practices that prioritize health, equity, environmental justice and sustainability, aligning with the EPA's mission to protect human health and the environment. APHA members have decades of expertise and a commitment to evidence-based decision-making, uniquely qualifying our association to provide informed and credible input on EPA's Interim Framework for Advancing Consideration of Cumulative Impacts. We strongly believe this initiative is a critical step toward advancing environmental justice and protecting the health and well-being of communities historically overburdened by pollution and systemic inequities.

Support for Centering Cumulative Impacts to Improve Public Health. APHA supports the framework's focus on improving human health, quality of life and environmental outcomes in all communities. The principles outlined in the framework—including applying the best available science, centering lived experiences of communities and considering social determinants of health—align with evidence-based public health practices. We particularly appreciate the recognition of children, tribal communities, and other vulnerable populations who face disproportionate risks from cumulative impacts.

The emphasis on integrating cumulative impacts into EPA decisions across programs and regions reflects an important understanding that environmental health cannot be addressed in silos. Instead, it needs a comprehensive, integrated approach to ensure equity and justice in the environmental health of vulnerable populations. Chemical and non-chemical stressors interact

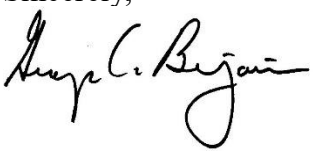
and compound, amplifying risks for marginalized and overburdened populations. This holistic approach represents an essential shift toward equitable health outcomes.

Advancing Environmental Justice through Tribal Consultation. APHA applauds EPA's commitment to advancing environmental justice, as outlined in the Biden administration's Executive Order 14096 and the Justice40 Initiative. By prioritizing meaningful community engagement and tribal consultation, the framework acknowledges the expertise, ethnographic views, cultural values and lived experiences of those most affected by cumulative environmental and health burdens. We urge EPA to ensure that community-empowered engagement processes are inclusive, accessible and transparent so all voices, particularly those from marginalized communities, can inform the agency's work.

Operationalizing Science for Action While Respecting Cultural Norms and Practices. The Framework's reliance on the best available science and data is essential to protecting public health. APHA supports the examples of applied science highlighted in the draft, including updates to soil lead guidance, water permitting processes that incorporate tribal cultural considerations, and air pollution rules that account for health risks from cumulative exposures. These actions demonstrate how the framework can deliver tangible benefits for communities.

APHA strongly supports EPA's efforts to operationalize cumulative impacts in decision-making to protect public health and advance environmental justice. To ensure success in applying this framework, we also call on EPA to continue expanding data accessibility, strengthening technical assistance, monitoring and evaluating progress in applying the framework and continuing to leverage interagency collaboration. We appreciate the opportunity to provide input on this critical initiative and look forward to continued collaboration to protect public health by ensuring all communities have access to clean air, clean water and a healthy environment.

Sincerely,



Georges C. Benjamin, MD
Executive Director