General comments

The Interim Cumulative Impacts Assessment Guidelines represent a major step forward in addressing the complicated, intertwined environmental and health challenges that disproportionately affect vulnerable communities. These guidelines seek to provide a more complete approach to environmental decision-making by taking into account the cumulative effects of multiple stressors over time. In doing so, they recognize the importance of environmental justice and the need to reduce health disparities among historically marginalized populations. Still, while the guidelines display several strengths, including their focus on health equity and environmental justice, they also have gaps that must be addressed in order to be as effective as possible. Downfalls include multiple weaknesses and limitations in the current guideline including data gaps and uncertainty, lack of structured methodology, and absence of clear enforcement mechanisms. In this comment I will touch on strengths, weaknesses, and recommendations for improving the guidelines to ensure their effectiveness and accessibility to all communities, particularly those most at risk from environmental harm.

Strengths

The Interim Cumulative Impacts Assessments Guidelines does have many strengths including the acknowledgement that cumulative impacts include more than just the outcome of individual projects but also involve interactions between environmental, economic, and social factors. This more complete approach helps to make sure decision making processes encompass the real challenges faced by the affected communities. The assessment guidelines also have a strong emphasis on environmental justice by aiming to ensure assessments incorporate the concerns and needs of vulnerable communities. This emphasis is very important for recognizing how historical environmental burdens have disproportionately affected particular groups like racial minorities and low-income populations.

Another strength of the assessment's guidelines is a focus on health equity by using cumulative impacts to help to assess the long-term health effects from living with environmental hazards which are often overlooked in other assessments. This highlights the need to evaluate the direct human health impacts like asthma due to poor air quality and indirect health impacts such as mental stress from living in a noisy polluted environment.

Weaknesses

Despite the strengths mentioned above there are weaknesses and limitations in the current guidelines. A major challenge is the uncertainty and lack of reliable data on

cumulative impacts. The guidelines do mention this, however they do not offer clear strategies aimed at overcoming uncertainty and data gaps. There is also a lack of clear procedures. The guidelines outline general principles but do not offer detailed strategies on how to assess cumulative impacts effectively. This could be an issue in implantation between agencies.

There is also limited stakeholder involvement outlined in the guidelines. The guidelines call for public participation but do not identify how to make sure there is meaningful involvement from marginalized communities. The success of the guidelines is dependent on the level in which affected communities are permitted and able to participate in the assessment process. If there are not outlined access ideas for the public to be able to add their input these communities can still be excluded. An important missing aspect of the guidelines is that there is not a lot of focus on carrying out the enforcement of recommendations that come from the cumulative impact assessments. With no distinct enforcement provisions, the guidelines may not have the strength to drive visible changes in policy.

Potential benefits

Potential benefits of the guidelines include improved health outcomes by considering cumulative effects that the guidelines could assist in raising positive health outcomes in vulnerable communities. Mitigating environmental burdens could directly result in the decrease in prevalence of diseases like asthma and other health conditions related to pollution. Increased accountability is another potential benefit as the guidelines have the ability to increase accountability by requiring decision-makers to look at the wider view of the social and environmental consequences of their actions. This can lead to more equitable decisions in many areas including public policy and infrastructure.

Recommendations

To address the gaps and limitations of the guidelines and increase the overall impact of the Interim Cumulative Impacts Assessment Guidelines I offer a few recommendations. These recommendations include developing clear methodologies by providing more tangible methodologies and tools for conducting cumulative impacts assessments including framework for measuring indirect and direct health effects and standardizing an approach for data collection.
Also important is ensuring data equity and availability by strengthening efforts to mitigate data gaps especially in vulnerable communities by collecting environmental health data in these communities and making sure that information is available to the public and policy makers. I would also recommend that there is ample engagement with

vulnerable communities constantly throughout the entire process including the beginning to ensure communities have the ability to provide concerns and input. This could entail having resources for community-based organizations. The creation of clear enforcement strategies, such as detailed enforceable actions to ensure that results of cumulative impacts assessments result in tangible actions. This could be achieved by having a framework that ensures those in power are held accountable to focus on health disparities in different communities.

References

U.S. Environmental Protection Agency. (2024, November 21). *Interim framework for advancing consideration of cumulative impacts*. https://www.epa.gov/system/files/documents/2024-11/epa-interim-cumulative-impacts-framework-november-2024.pdf