Dear Environmental Protection Agency,

I am writing to provide comments on the Environmental Protection Agency's Interim Framework for Advancing Consideration of Cumulative Impacts. My name is Dionna Brown, and I am a resident of Flint, Michigan. I am a child of the Flint Water Crisis. I serve as the National Director of Youth Environmental Justice Policy and Programs for Young, Gifted & Green, a national environmental justice organization dedicated to empowering youth in advocating for sustainable and equitable environmental policies. In addition to submitting this comment as an individual, I also want to express my support for the official comment submitted by Young, Gifted & Green, which strongly endorses the framework while calling for enforceable protections, stronger accountability measures, and prioritization of frontline communities like Flint.

Flint serves as a case study of cumulative environmental and social stressors that disproportionately harm marginalized populations. The Flint Water Crisis, which began in 2014, exposed thousands of residents—primarily Black and low-income communities—to lead contamination, with devastating long-term health consequences (Edwards et al., 2020). However, the water crisis was only one of many environmental burdens Flint has endured. Beyond the water crisis, Flint residents continue to suffer from multiple, overlapping environmental stressors, including poor air quality due to industrial emissions and high traffic pollution, increasing rates of asthma and respiratory illnesses (Michigan Department of Health and Human Services [MDHHS], 2022). The city also faces soil contamination from legacy industrial pollution, contributing to exposure to heavy metals and other toxins (Jacobs et al., 2019). Food insecurity is another critical issue, exacerbated by a lack of grocery stores and fresh food access, leading to poor nutrition and higher rates of diet-related diseases (Sadler et al., 2021). These environmental burdens are compounded by socioeconomic challenges such as high poverty rates, which currently stand at 38.8%, and limited healthcare access, further exacerbating the negative health effects of these stressors (U.S. Census Bureau, 2023).

Young, Gifted & Green's official comment highlights how children exposed to lead suffer long-term developmental consequences, including learning disabilities and behavioral challenges (NRDC, 2024). Moreover, as seen in places like Louisiana's Cancer Alley, communities with high cumulative exposures experience significantly higher rates of adverse birth outcomes (The Guardian, 2024). Research has indicated that maternal exposure to high levels of air pollution increases the risk of preterm birth and low birth weight, conditions that disproportionately impact low-income communities of color (Hanna-Attisha, 2018). The EPA must take these intergenerational health effects into account when finalizing its framework. It is not enough to acknowledge these disparities; the agency must implement legally binding cumulative impact assessments to prevent further harm in places like Flint.

The current framework provides guidance but lacks enforcement mechanisms. The EPA must mandate cumulative impact assessments as a legal requirement for any permitting decisions affecting environmental justice communities. Research has shown that regulatory agencies often fail to consider the combined effects of multiple environmental stressors, leading to increased health risks in marginalized communities (Morello-Frosch et al., 2011). By making

cumulative impact assessments a legally binding component of environmental permitting, the EPA can ensure that overburdened communities receive the protections they deserve. Additionally, environmental justice communities like Flint must be at the center of cumulative impact assessments and regulatory decisions. The framework should establish a scoring system or prioritization model that directs resources and regulatory actions toward communities experiencing the highest levels of cumulative stressors. Such models have already been successfully implemented in states like California, through the CalEnviroScreen tool, which prioritizes communities for environmental protection efforts (Office of Environmental Health Hazard Assessment [OEHHA], 2022). The EPA should adopt a similar nationwide approach to ensure that those who have historically faced environmental harm receive the necessary protections and interventions.

The importance of enforcement cannot be overstated. As Young, Gifted & Green notes, communities such as Flint have suffered from repeated environmental crises with minimal accountability for polluters (Hanna-Attisha, 2018). The EPA must strengthen its ability to enforce environmental laws by increasing real-time environmental monitoring of air, water, and soil in frontline communities, imposing stronger penalties on industries that contribute to cumulative environmental harms, and establishing a federal environmental justice task force dedicated to holding violators accountable. Without these measures, communities that have already suffered from systemic environmental injustice will continue to be exposed to harm.

Additionally, the Interim Framework should be backed by substantial federal investments in pollution remediation, green infrastructure, and public health interventions. Evidence shows that investments in community-driven environmental justice initiatives result in measurable health improvements and economic benefits (Bullard et al., 2021). The EPA should allocate funding to remediate contaminated sites and reduce toxic exposures in vulnerable communities, develop green infrastructure projects that improve environmental resilience, and fund community-led air and water quality monitoring programs to ensure transparency and public access to environmental data. Without these financial commitments, the framework may fail to deliver meaningful change for communities that need it most.

The Interim Framework for Advancing Consideration of Cumulative Impacts is a step in the right direction, but unless it translates into enforceable action, frontline communities like Flint will continue to bear the burden of environmental injustices. I strongly urge the EPA to make cumulative impact assessments legally binding in regulatory decisions, prioritize environmental justice communities for regulatory protections and resources, engage youth and community leaders as key stakeholders in policy implementation, strengthen enforcement against polluters that contribute to cumulative environmental harms, and dedicate federal funding to long-term environmental and public health solutions. Young, Gifted & Green has made similar recommendations in its official comment, underscoring the urgency of these measures. Flint residents and communities like it across the country cannot afford another crisis. Stronger policies, accountability, and immediate action are necessary to protect public health and ensure environmental justice for all.

Thank you for the opportunity to submit this comment. I urge the EPA to strengthen and finalize this framework with a firm commitment to real-world impact.

Sincerely,

Dionna L. Brown, MA, MPHc

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