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Comment submitted by Richard Reibstein

Posted by the **Environmental Protection Agency** on Feb 10, 2025

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Comment

In reference to the Interim Framework for Advancing Consideration of Cumulative Impacts
Docket ID Number: EPA-HQ-OLEM-2024-0360

I am lifelong environmentalist. I lecture on environmental law and policy at Boston University in the Department of Earth and Environment. For nearly a quarter of a century I helped companies to be more environmentally responsible as a Massachusetts state employee, and four three years I enforced environmental law for EPA and the Commonwealth. I have dealt with many issues and the most difficult to make progress on has been environmental justice. Nobody has seemed to know how to "operationalize" it. It has been a "good idea" for too long. The EPA is taking steps to make it something we can take action on. The Commonwealth of Massachusetts began this effort back in the 1990's. I remember, I was there. We realized how complex it was and that it would take a long time not just to figure out how to do cumulative impact, but how to also get everyone to agree upon how to do it. The Commonwealth has recently put into practice a method that it now uses in approving air permits. New Jersey and California have developed EJ Screens. But more needs to be done. The EPA, with this guidance, provides a crucial foundation that will be regarded as a landmark by future policy historians, even if it is not implemented, because it is the right idea, it is the way to go forward, and EPA is to be highly commended for this work.

This current Administration will not implement this plan, unless it is forced to do so. Eventually that primitive and thoughtless resistance to inevitable justice will be overcome. In the meantime I am happy to place on record my professional and academic praise of this proposal by EPA. I look forward to an administration that will restore respect for the people of this country, and the efforts of our agencies to protect us from unnecessary harm. To have a program that incorporates actionable features of environmental justice is something we must not fail to have. Thank you, EPA, for moving our thinking and knowledge forward to this point, so that when the people of this country restore a government that works for them, they will be guided in their efforts. This is the way forward on environmental justice. Please resume this evolution when you are once again allowed to work for the American people. Rick Reibstein, Boston University.

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Comment ID

EPA-HQ-OLEM-2024-0360-0012

Tracking Number

m6q-o0xf-h2d5

Comment Details

Document Subtype

Public Comment

Received Date

Feb 4, 2025

Postmark Date

Feb 4, 2025

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