

NEJAC RECOMMENDATIONS SUMMARY

Supporting Comprehensive, Solution-Oriented, Community-Driven Programs

ABOUT THIS SUMMARY

In October 2024, the National Environmental Justice Advisory Council Cumulative Impacts Workgroup published a report of recommendations to the EPA, [Reducing Cumulative and Disproportionate Impacts and Burdens in Environmental Justice Communities](#). To improve environmental health protections by reaching a larger audience, the Union of Concerned Scientists prepared eight fact sheets summarizing the workgroup's recommendations. Natalie Gehred, a doctoral student in molecular biology at the University of California, Los Angeles, and Dr. Kristie Ellickson, a senior scientist at the Union of Concerned Scientists, prepared the summaries.

This document summarizes Theme 6 of the report: [EPA should support comprehensive, solution-oriented, community-driven programs](#).

For additional summaries, please visit act.ucusa.org/NEJAC. For the full report, please visit act.ucsusa.org/NEJAC-report.

There are many types of comprehensive, solution-oriented, community-driven approaches, including environmental impact areas, environmental improvement areas, community action plans/roadmaps, green zones, and ecozones. Such programs allow [a holistic, cumulative approach to improving environmental and community health](#) (see Appendix D in linked full report).

Use management zones to address cumulative impacts.

A management-zone strategy leverages eco-districts to reduce environmental stressors and burdens. Codeveloped by residents, advocacy groups, and local governments, management zones can guide planning to incentivize environmental best practices and disincentivize burden drivers. To address cumulative impacts in overburdened areas, regulators should aim their work at management zones more often.

Advance comprehensive community approaches by integrating the regulatory toolkit with pollution prevention and reduction initiatives.

Cumulative impact assessments must inform both regulatory decisionmaking and voluntary pollution reduction (i.e. outside of a permit or rule). In overburdened communities, a proposed increase from a single pollution source will be relatively minor compared with the

whole pollution burden. Rather than justifying “proportionally small” increases in emissions, regulatory decisions must instead set firm limits based on cumulative indices.

The NEJAC strongly recommends that regulators expand and implement community-driven approaches and link these to regulatory actions that avoid the backsliding that can occur with voluntary pollution prevention. This is why the California Green Zone Initiative organizes a region to examine cumulative impacts and land-use planning. The information gathered has been used to inform regulatory decisions, such as rules and permit conditions (California Environmental Justice Alliance 2018).

Regulating agencies should accelerate approaches that align with their own structures and cultures.

EPA Region V community action plans and roadmaps outline six key steps for engaging in local decisionmaking. Developed to align with the EPA’s organizational structure and culture, the action plans and roadmaps provide compelling examples of cumulative impacts approaches. The development of standard operating procedures and performance metrics will help ensure consistent, outcomes-oriented implementation across EPA offices and programs. There should be no barriers to broad implementation of these plans and roadmaps.

Embed accountability to impacted communities.

Accountability for the results of community visioning efforts is crucial; otherwise, communities waste time and resources. Tools to promote accountability include memoranda of understanding, Community Benefits Agreements, Good Neighbor Agreements, and community benefits ordinances.

Require metrics that track the outcomes of comprehensive community approaches.

Outcomes from community-focused approaches must be tracked and tied to budget decisions. Modeling cumulative impact assessments after Health Impact Assessments, as the NEJAC recommends, will make outcome tracking integral to the reporting and monitoring phases, thus making projects more sustainable.

Coordinate so that comprehensive community approaches result in pollution reductions.

Because cumulative impact assessments might inform the work of other agencies or organizations, barriers to interagency collaboration must be removed. Mechanisms to track the work of multiple agencies in one community are essential to coordinating services well. That way, no agency can ignore the cumulative risks of chemicals merely because others have the ultimate authority to address those risks.

Internal coordination among media-specific programs is also crucial to preventing the unmanaged movement of pollution from one environmental medium to another. Coordination should encompass people, data, and programs. Furthermore, research and regulatory offices

must communicate so that researchers investigating cumulative impacts have unimpeded access to on-the-ground regulators and permit engineers.

Avoid unintended negative outcomes.

Comprehensive community approaches need to include intentional and evidence-based plans for avoiding displacing residents (e.g., due to gentrification). Implementation also involves paying close attention to avoiding waivers, loopholes, or exemptions that allow disproportionate cumulative impacts and burdens to persist.

Continue to engage in community engagement, codesign, and shared leadership.

Assessments should incorporate true and meaningful engagement, codesign, and shared leadership at every stage. Conversations and collaborations between communities and regulators must be treated as partnerships, and both parties must have opportunities to refine ideas and terms as they experiment and learn from their collaboration. Communities are a source of creativity and innovation, as these are also fundamental features of the scientific method. Communities must be afforded access, standing, and influence, ranging from active participation in government-initiated cumulative impact assessments to leading the assessment process (Key et al. 2019).

As much as possible, regulators should avoid opaque decisionmaking; they should seek to realize the community's vision, while being transparent about processes where they exercise the final say. As regulators work toward practicing community-engaged research, their efforts must be biased toward action and informed by lived experience.

References

- California Environmental Justice Alliance. 2018. "About the Green Zones Initiative: What is a Green Zone?" <https://calgreenzones.org/about-the-green-zones-initiative>
- Key, Kent D., Debra Furr-Holden, E. Yvonne Lewis, Rebecca Cunningham, Marc A. Zimmerman, Vicki Johnson-Lawrence, and Suzanne Selig. 2019. "The Continuum of Community Engagement in Research: A Roadmap for Understanding and Assessing Progress." *Progress in Community Health Partnerships: Research, Education, and Action* (13) 4: 427–434. <https://doi.org/10.1353/cpr.2019.0064>