

Cleaner Air, Cleaner Communities

6 Steps to Develop Environmentally Just Clean Air Act State Implementation Plans (SIPs)

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WE ACT for Environmental Justice



Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

- **Identify and address** the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law.
- **Develop a strategy** for implementing environmental justice.
- **Promote nondiscrimination** in federal programs that affect human health and the environment,
- **Provide** minority and low-income communities **access to public information and public participation.**

The Clean Air Act

- The CAA calls for states and EPA to solve multiple air pollution problems through programs based on the latest science and technology information.
- States are required to devise and carry out state implementation plans (SIPs) to clean up dirty air and protect clean air from degradation.
- The Act sets minimum requirements for measures that must be included in these plans.
- Plans must be submitted to EPA for review to ensure that they meet the CAA's requirements.

Why are SIPs Important?

- Contain emission limits and compliance schedules for stationary pollution sources, such as power plants and factories.
- May include state measures to reduce emissions from existing vehicles, such as state emissions inspection and maintenance programs that require cars with excessive emissions to be tuned-up or repaired.

Don't you think communities should be involved in these discussions?

Purpose of Guidance Document

Develop an environmental justice checklist and assessment tool to engage state agencies and partners in addressing environmental justice concerns within the Clean Air Act State Implementation Plans (SIPs)

Overview: Environmental Justice and SIPs

- Step 1: Assess Social and Environmental Disparities
- Step 2: Structure Meaningful Community Engagement
- Step 3: Identify Community Needs Related to Air Pollution and Reduction Strategies
- Step 4: Evaluate Community Impacts and Benefits of Pollution Reduction Strategies
- Step 5: Develop Community-Responsive SIP
- Step 6: Engage Community in Collaborative SIP Implementation



Self Assessment: Current State of Planning

Step	State Implementation Plan	Mark “yes”, “no”, or “in part”
1	Do you know which communities are most affected by air pollution?	
2	Do you have an iterative and inclusive stakeholder engagement to embed community feedback into the SIP?	
3	Have you identified community needs related to air pollution and reduction strategies (e.g. health and jobs)?	
4	Have you evaluated the community benefits and impacts of pollution reduction strategies in the SIP?	
5	Does your SIP and subsequent policies, guidance and regulations benefit the most impacted communities?	
6	Does your implementation approach allow communities to participate collaboratively in compliance, enforcement, guidance development, monitoring and tracking progress?	

Step 1: Assess State-wide Quality of Life and Environmental Disparities

Proximity

- Facility emissions and status
- Fossil fuel extraction, transport and waste facilities
- Cumulative impacts
- Cultural, historic and religious places
- Schools
- Parks
- Outdoor workers (e.g. farms)

Health Impacts

- Health Impact Assessment
- Exposure (Community and Individual)
- Medically underserved
- Medically Sensitive

Economics

- Workforce transition
- Energy cost burdens
- Distribution of funding
- Life cycle analysis

Social

- Education level
- Language barriers
- Poverty and unemployment
- Race
- Age

Step 2: Structure an Authentic Stakeholder Engagement Process



Step 2: Self Assessment: Broaden Stakeholder Engagement

Community Groups and Service Providers	Community Liaisons and Leaders	Educators and Students	Industry Workers	Extraction, Transport, Use and Disposal	Government Agencies
Health care providers	Elected officials	University faculty and students	Manufacturing	Residents along rails and pipelines	Local and regional governments
Family support groups	Local, state and regional commissions	K-12 students and teachers	Power Plants	Residents near coal mines or oil and gas	State governments (non-air related)
Cultural groups	Foundations	Youth commissions and organizations	Coal Miners	Residents near refineries	Tribal governments
Faith-based groups	Tribal organizations		Renewable Energy	Residents near hazardous waste disposal sites	
Outdoor clubs and sports groups			Utilities		

Step 3: Identify Community Needs

Common Community Goals and Concerns

- Noise/Traffic/Idling/Diesel emissions
- Odor
- Health impacts
- Light pollution
- Freight trains
- Additive impacts of facilities and pollution
- Safety
- Jobs and training
- Spills and explosions

Case Study: Identifying Violations Affecting Neighborhoods (IVAN)

- Environmental neighborhood watch program
- Monthly meetings of local, state, and federal authorities with environmental justice advocates
- Online and in-person real-time agency response to complaints

Step 4: Evaluate Community Impacts and Benefits

Pollution Reduction Strategy	Emissions reductions	Change in health risk inequalities	Change in socioeconomic conditions	Distribution of costs	Distribution of staff
Prevention					
Technology					
Cap and Trade					
Energy Efficiency					
Incentive Based					
Compliance and Monitoring					
Enforcement					

Step 5: Develop the Community Responsive SIP

SIP Element	Potential EJ Component
Emissions Inventories	<ul style="list-style-type: none"> • Inclusion of minor sources • Role of energy efficiency • Multipollutant analysis • Life Cycle Analysis (extraction, transport, storage and disposal)
Monitoring Network	<ul style="list-style-type: none"> • Unmonitored Air Analysis • Regional Collaboration • Community-based Monitoring/Citizen Science
Enforcement and Regulations	<ul style="list-style-type: none"> • Distribution of staff and funding • Cultural competence • Incorporation of community needs and vulnerabilities
Contingency/Emergency Plans	<ul style="list-style-type: none"> • Trigger actions to protect health • Engage with existing social networks

Step 6: Engage the Community in SIP Implementation

- Identify a clear, meaningful role for communities
- Include community-based guidance
- Support participatory and community-informed budgeting and hiring principles
- Highlight and utilize citizen monitoring and enforcement
- Engage universities or other third-party in tracking progress to increase transparency and accountability
- Include easy to understand tools for tracking and communicating progress

Global Community Monitor

- Importance of tracking emissions in each neighborhood
- Insufficient coverage through state air quality monitoring stations
- Importance of Citizen Science
 - Data Quality Assurance Plans
- Bucket Brigade Program (www.gcmonitor.org)

Through This Process

- Opportunity for Meaningful Community Engagement
 - Improve Air Quality
 - Address Environmental Justice and Other Community Concerns
 - Improve Health in Areas Most Affected
 - Ensure that Solutions to Air Pollution, including both controls and clean energy opportunities, are placed where the need is highest

Using These 6 Steps, State Agencies Can:

- Increase Interagency Collaboration
- Build Trust with the Community
- Address multiple needs and benefits concurrently
- Be more cost effective in programs to reduce air pollution
- Provide an opportunity for enhancements beyond existing plans

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THANK YOU

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