

Thank you for the opportunity to comment directly to the EPA National Environmental Justice Advisory Council on the long-awaited release of the EPA cumulative impacts framework.

We are writing on behalf of Coming Clean ([Home — Coming Clean, Inc. \(comingcleaninc.org\)](https://comingcleaninc.org)), a coalition of environmental health, community, environmental justice and advocacy groups that work towards health protective chemical policies as reflected in the [Louisville Charter for Safer Chemicals](#). Our Cumulative Impacts and Mandatory Emissions Reduction Team ([Cumulative Impacts and Mandatory Emissions Reductions Team — Coming Clean, Inc. \(comingcleaninc.org\)](#)) has been meeting for over two years to engage and encourage agencies to develop and implement practices and decision-making that protect and reflect real life experiences in frontline and other highly impacted communities.

We appreciate EPA's request to the NEJAC to work on cumulative impacts, and we look forward to reading the NEJAC cumulative impacts workgroup's recommendations.

You have specifically requested comments on the charge. The charge is appropriate to establish a large scope of work and should ensure that the NEJAC Cumulative Impacts workgroup will not be limited in its ability to provide actionable and comprehensive recommendations. Our (Coming Clean - Cumulative Impacts/Mandatory Emissions Reduction) team urges the NEJAC Cumulative Impacts workgroup to, in addition to conducting its own analyses as laid out in the charge, also look into options within EPA that bring a broader perspective and additional disciplines. This ensures that the NEJAC Cumulative Impacts workgroup's recommendations to address and assess cumulative impacts are comprehensive.

We support adoptions of a strong, action-focused cumulative impacts framework by EPA, the agency committed to developing and releasing a framework in its [Equity Action Plan](#). The Biden administration further pressed EPA to do so in his [Executive Order 14096](#): Revitalizing Our Nation's Commitment to Environmental Justice for All earlier this year. Therefore, EPA must demonstrate a clear policy direction and articulate it in the public sphere in a strong engagement process so that EPA's work moving forward actually fulfills these directives and results in reduced toxic exposures in frontline communities.

We support movement toward implementation of cumulative impacts practices and away from the reductionist approaches of traditional human health risk assessment. We are concerned about what we have seen so far from EPA in the Cumulative Risk Assessment Planning and Problem Formulation document released last spring. We provided comments to EPA voicing our concern for the undue emphasis on screening proposals out of completing assessments with a cumulative lens rather than focusing on to what extent and how these might be accomplished.

We are concerned that EPA has not yet recognized that the fundamental approach to assessing and addressing cumulative impacts will not be the same as the approach to assessing risks from single chemicals based on use of a quantitative dose-response curve. For too long, traditional risk assessment has allowed more and more increases of toxic exposures to Environmental Justice communities with no end in sight. Traditional risk assessment does not reflect anyone's exposures nor does it support reductions in disparities of chemical burdens in historically disinvested communities.

We support the extension of EPA's cumulative impacts work into its regulatory programs. It is way past time for environmental decision-making to reflect consideration of multiple chemicals, multiple sources of pollution, and existing health and social stressors and burdens. The current system does not protect people and is overly expensive, time-consuming, and burdensome for everyone.

We urge NEJAC to press EPA to release a strong, comprehensive cumulative impacts framework. We are ready and able to engage with you in this work, provide comments, and advance system change.

Commenters thank NEJAC for this chance to communicate our concern with the delay on EPA's movement toward a regulatory system informed by cumulative impacts analyses and we strongly urge EPA to move forward. We truly appreciate all that the Biden administration, the EPA, the NEJAC, and the WHEJAC are doing to advance work on the many complex issues related to achieving justice.

Signed,

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