



MEMORANDUM

TO: MWAQC Environmental Justice Subcommittee
FROM: Robert Christopher, Environmental Planner
SUBJECT: Summary of Comments on Draft EJ Action Plan
DATE: March 28, 2025

This memo provides an overview of the key comments and recommendations received on the draft Environmental Justice (EJ) Action Plan. The feedback highlights several areas for improvement to ensure the plan effectively addresses environmental justice concerns and improves air quality.

SUMMARY

The draft of the Environmental Justice (EJ) Action Plan was released on February 21, 2025 with public comments due by March 20, 2025. The draft attracted a diverse range of feedback from community members, advocacy groups, public health experts, and other stakeholders. The key areas of feedback address the need for specific goals, accountability measures, prioritization of EJ areas, implementation timelines, stronger targets, and clearer language. Feedback was received from 11 organizations ranging from state departments of transportation to advocacy groups and individuals, emphasizing the urgency of addressing environmental health disparities in overburdened communities. A summary follows:

1. Need for Clarity and Definitions

Stakeholders emphasized the importance of providing clear and consistent definitions for terms such as "equity," "underserved," "environmental justice," and "disadvantaged." These definitions should be applied uniformly throughout the document to enhance clarity and precision.

2. Concerns About Sources of Pollution

There were questions regarding the extent of emissions from industrial sources, such as power plants, compared to transportation and area sources. Commenters suggested further analysis to accurately characterize the contributors to air pollution in the region.

3. Importance of Enhanced Monitoring

A significant emphasis was placed on the deployment of hyper-local air quality monitors. Stakeholders argued that this initiative should be prioritized to align with the action-oriented goals of the plan. Additionally, combining air quality monitoring maps with vulnerability maps was recommended to better visualize and address disparities.

4. Calls for Stronger Language and Targets

Many comments advocated for replacing voluntary language in the draft with mandatory terms to underscore the necessity of proposed actions. Contributors also recommended

aligning air pollution reduction targets with international guidelines, such as those set by the World Health Organization (WHO).

5. Addressing the Built Environment

Feedback stressed the importance of addressing air quality impacts within the built environment. Proposed strategies included transitioning to net-zero building codes and electrifying residential homes, particularly in underserved communities, to promote equity and reduce exposure to indoor air pollutants.

6. Public Health Considerations

Experts recommended the inclusion of additional public health impacts associated with air pollution, such as preterm birth and low birth weight. There were also calls for further studies on emissions from specific facilities and localized air quality monitoring near areas of concern.

7. Accountability and Implementation

The comments identified the need for measurable goals, accountability mechanisms, and implementation deadlines. A phased approach was recommended to prioritize action in areas with the most severe air pollution risks, ensuring timely progress while addressing broader regional needs over time.

8. Learning from Successful Initiatives

Stakeholders encouraged the use of existing community-driven air quality initiatives as models for the plan. Learning from these real-world examples would provide valuable insights into effective strategies for improving air quality and addressing environmental justice concerns.