



Citizens Advisory Council

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Please Note: Our New Fax Number is 717-772-5748

The Work Group has defined "Environmental Justice" as the "fair treatment and meaningful involvement of all people with respect to the identification of environmental issues, and the development, implementation, and enforcement of environmental policies, regulations and laws." Because studies show that minority and low income communities have historically borne a disproportionate share of the negative environmental impacts resulting from industrial, municipal, and commercial activities, the report targets their specific environmental justice needs as the first priority for Pennsylvania to work towards environmental justice for all communities.

While I agree that our first focus should be on known "environmental justice" communities, I remain unconvinced that our two simple criteria capture all communities already bearing or at risk of bearing undue environmental burdens. The Work Group defined minority and low-income communities based on somewhat arbitrary thresholds that we thought would include certain communities most in need of assistance and empowerment. However, communities that are not captured by these thresholds that also bear a disproportionate environmental impact, or that may be imminently at risk of doing so, will only receive additional assistance to the extent that some of the recommendations will have to be implemented across the board.

For example, because of its focus on permitting, *the report does not address communities bearing undue burdens from past activities, unless the communities meet the defined criteria.* The Citizens Advisory Council has received testimony on a number of communities already bearing disparate environmental impacts, which may not be eligible to take advantage of the recommendations contained in this report simply because of demographics.

It also does not specifically address issues related to coalfield communities. While the environmental justice movement is primarily linked to the civil rights movement and the plight of minority and low-income communities, coalfield justice has historically been a concern in Pennsylvania and throughout Appalachia. Coalfield communities struggle with environmental and socioeconomic problems resulting from resource extraction, and share similar socioeconomic factors with "environmental justice" communities, including the lack of a community voice in decision-making. While the work group recognized the special needs of coalfield communities, it could not reach agreement on specifically including them in its recommendations.

Finally, I remain unconvinced that government should only react to existing conditions, and instead would have recommended a more proactive approach in order to also prevent the creation of future environmental justice communities. The report should have included some general recommendations specifically designed to avoid the creation of more environmental justice communities by ensuring that all communities have certain public participation rights.

I support the recommendations contained in the report as a first step towards environmental justice in Pennsylvania, but encourage the department, the Environmental Justice Advisory Board and the Office of Environmental Advocate to maintain a broader view in implementing and evaluating the effectiveness of the Workgroup's recommendations.

Susan M. Wilson
Executive Director
Citizens Advisory Council to DEP

