NEJAC RECOMMENDATIONS SUMMARY

Promoting Climate Justice

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 8 of the report: The EPA should promote climate justice.

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

Those who experience the largest and most frequent negative impacts from climate change also often experience greater environmental, social, and public health stressors—in other words, cumulative impacts. Understanding and incorporating the intersections of climate justice and cumulative impacts requires deep consideration of the complex history of social and climate inequities, including how corrective actions may inadvertently or unjustly magnify disproportionate impacts.

From a US perspective, climate justice entails several general principles (Mary Robinson Foundation—Climate Justice n.d.):

- Respecting and protecting human rights;
- Sharing benefits and burdens equitably;
- Ensuring participation transparency and accountability;
- Ensuring a fast, fair phase-out of all fossil fuels;
- Acting now;
- Protecting future generations; and
- Invoking caution in the face of uncertainty.

Concerned Scientists

Strive to make decisions transparent, holistic, and connected.

As states address climate justice and climate change mitigation and adaptation, their efforts must be transparent, with publicly posted information, updates, reports, and webinars. A systemic, interconnected approach to environmental protection is also necessary to prevent the disproportionate effects of climate-related events on disadvantaged communities.

Assessments that strive to be as holistic as possible could draw on expertise in system dynamic modeling, ecology, and economics; these fields more easily assume and accept complexity. Such expertise offers helpful insights into addressing the sometimes invisible systems and structures that increase disproportionate harm in marginalized communities.

The public sector, too, has a major role to play in equitably allocating resources and providing needed services. The resilience-hubs concept offers approaches for overburdened communities to access climate-related programming and services. Networks of resilience hubs could deliver local programs and services to meet community-identified resilience needs.

Learn about and acknowledge biased policies, both historic and current.

Underlying biased systems and structures in government and decisionmaking perpetuate and worsen climate impacts. Furthermore, default assumptions in assessments based on the people or land of the majority population cannot always be generalized everywhere and to everyone. This is why it is crucial to consider the impacts of colonialism and racially biased systems as compounding stressors. Many resources are available for education and organizing around understanding the systems and structures that perpetuate social disparities (Commons Social Change Library n.d.)

Use the National Environmental Protection Act (NEPA) to mitigate the impacts of climate change and prevent the accumulation of chemical stressors.

The NEJAC recommends that regulatory agencies strengthen three specific aspects of the implementation of the NEPA to advance climate justice:

- Strengthen the emphasis on the environmental justice aspects of decisions.
- Integrate the different environmental media impacts.
- Give more consideration to the impacts of projects that attempt to address climate adaptation.

Cumulative effects and environmental justice are required analyses in NEPA reviews. Many proposals with a high probability of indirectly or directly increasing greenhouse gas emissions (e.g., large energy projects, pipelines, highway projects) require more effort to including systemic impacts (e.g., indirectly increasing fossil fuel needs or local toxics) from the perspective and experiences of people most marginalized and without basic needs.

Analyses under NEPA must not be based only on what might occur under conditions in the temperate mainland. Despite common threads, every community is different. There must be consideration of how climate impacts can vary across the diverse geography of the United

States, including the US Virgin Islands, Puerto Rico, Hawaii, and Alaska. Cumulative impact and climate vulnerability tools must be developed to represent stressors important to US states and territories outside the mainland. When regulatory agencies assess chemical risks in air and water, under NEPA or other laws and rules, they must acknowledge the increased potential for exposures due to climate change, and vice versa (Flores et al. 2021). One way regulatory agencies can address this is to include important climate-related stressors (e.g., mental health indicators, extreme heat) in tools for mapping cumulative impacts and environmental justice. Another example would be to include chemical stressors or risk language in FEMA's risk-management training in identifying hazards, profiling hazard events, and inventorying assets.

Finally, governmental entities may implement climate mitigation projects as a result of NEPA or other assessments. In the urgent, much-needed transition away from fossil fuels and toward the adoption of programs for climate mitigation and adaptation, the regulatory agencies should drop barriers that hinder low-income communities from receiving climate-based benefits like weatherization, energy audits, and access to solar power. At the same time, regulatory agencies should avoid the hidden consequences of urgency, such as can occur with expedited or less-stringent permitting for facilities that provide weatherization materials. Many of these facilities (e.g., those that produce insulation) are located in overburdened communities and emit air pollution.

References

Commons Social Change Library. n.d. Accessed January 24, 2025. https://commonslibrary.org

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How the U.S. Environmental Protection Agency Can Protect the Public from Hazardous Chemical
Releases Worsened by Natural Disaster." Washington, DC: Center for Progressive Reform.

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National Environmental Protection Act. 42 U.S.C. § 4321 et seq. (1969).



www.ucsusa.org/resources/cumulative-impacts-recommendations-epa

The Union of Concerned Scientists puts rigorous, independent science into action, developing solutions and advocating for a healthy, safe, and just future.