

How can the EJ Policy address communities' environmental justice concerns?

Should be integrated at the community level as part of planning commission and with vetting of state based permits reviewed by DEP OEJ for demonstrated consideration of EJ impacts

Should be integrated in ALL permitting applications to assure that EJ impacts are taken into account as part of risk mitigation

Address public health concerns in EJ communities while allowing economic development and good paying jobs in the community

Use policy to announce that EJ exists across PA, rural and urban communities

Make EJ policy proactive (does a project even belong here in the first place based on measured, existing environmental burden) instead of reactive (project all ready, just providing more informational sharing).

Municipal help addressing legacy projects & future projects. All projects should have to examine EJ issues

Working in relationship with municipalities.

Informational meetings with applicants and the community

Integrated economic impacts and values related to EJ impacts as part of processes

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EJ offices in EJ communities

Analyze projects, and the impacts of these projects, on a more comprehensive basis than on a simple project-by-project basis (a less formal way of supporting cumulative impacts). This includes both duration, frequency and intensity.

Consideration of using citizen scientist as qualified sources of vetting issues

Let data lead the way (or at least let it help craft policy). The theory of EJ is built on the notion that certain areas shoulder an undue burden. Each burden is measurable. And each EJ status (income or minority) is measured. Use the data.

Ej should create satellites directly in communities. This would create a more direct relationships. Especially in underserved areas.

I live outside of Philadelphia and Upper Darby which is Delaware County. Much of the air quality that affects Philadelphia affects Upper Darby. Will the EJ policy speak to issues of air quality.

Sound science and transparency

Establish baseline data before projects

Track and measure EJ performance parameters e.g., regarding siting, response times, inspections, community engagement, etc.

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Quality conversations and shared objectives

For any project proposed in a known EJ zone, instead of starting with a presumption of "approved" start the analysis with a presumption of "prove this doesn't make the burden worse".

If a project proceeds in an EJ, craft policy that a certain portion of permit fees paid to the state must be retained and reused directly in the impacted community.

Can you provide information to EJ communities on an EJ website as to what permits are subject to commenting so that people in EJ community know when a facility has a permit application pending and EJ community have only one website to visit?

EJ is too reactive, should be proactive. Use data & technology more effectively. Need to look at the cumulative effects to the community during permitting process and be able to deny permits in overburdened communities.

I think that some out reach on the part of the department of environmental protection regarding environmental justice in communities would certainly help. Minority communities many times are the last to receive information. Yes success was the public

Build a staff that includes data specialists (collection, compilation, analyzing, interpreting) to build out a comprehensive Environmental Burden Score (EBS) for all areas. If the EBS for an area over a threshold, greater scrutiny / not allowed.

Define EJ's place in the state government and how it interconnects with other agencies giving it the seat at the adult table that everyone seems to agree it deserves.

What worked and what were challenges with the current EJ Policy?

Challenge: too exclusive, based on outdated census information and poverty level information, does not take into consideration span of enviro threats to excluded populations

There could be a more clear definition of EJ community within the policy that notes demographic and environmental indicators

No teeth for protection of citizens.... a conversation does not mean as appropriate action will follow.

The current EJ policy is good in theory but is advisory only. Effective EJ policy needs some teeth (enforcement rights) and to formally factor into decision making.

Challenge is that EJ has no real muscle so it's difficult to encourage public participation. People are busy and won't waste time if no action will be taken.

What will invoke an EJ action by DEP? Anecdotal, evidential, data submitted by who? What characteristics/ quality will be required?

I think the best way to connect with the community is through community organizations. They've done the work of connecting with the residents in their respective communities.

How can we improve the public participation process within the policy?

The key is open communication so commitment to routine progress updates and dialog with stakeholders should be identified.

Multi-lingual where needed.

Building awareness in communities that it is an EJ community. How do people know they live in an EJ community.

Don't expect people from affected communities to come to you or go places you would go. If you're trying to reach vulnerable populations, please recognize that they may not show up to City Hall or a school.

Do not allow permits to be reviewed until certain standards have been applied
All zoning requirements met
Community outreach completed
Experts heard from or experts reviewed from citizens groups
Open funding for community members for experts

Create a paid position that employs an EJ community member so they can do the community outreach

What types and ways of information intakes are available now? Video, social media, digital documents,, etc. Does this need to be investigated for modernization?

Involve more young people- social media, schools, colleges, parks
Often the "usual suspects" are older, wealthier people who have time to participate in these processes but don't feel the effects of these decisions long term

Meet people where they are. Posting information on the website is not going to be enough. Also think about places like daycare centers, after school programs and more targeted social media efforts.

How can we improve the public participation process within the policy?

Share/ post relevant, peer-reviewed, sound science.

Share success stories, accomplishments to model what can be done in other communities.

One step at a time. Can't do it all at once.

- DEP should be extra vigilant about high releases even if they are short term.
- DEP should make sure there are monitors in areas where people are most likely to be exposed
- Should have meaningful fines for exceeding limits and increasing risk

race income and health outcomes

How can DEP address environmental justice concerns in addition to public participation in the permitting review process?

"Bad Actors" - too many companies who get permits have bad records in other areas- are there processes to review previous projects? Are there processes to reject these companies from receiving new projects?

Interagency collaborations to assure consistency across govt agencies, share information on permit applicants

Review the data for the entire region and evaluate the cumulative impacts a community bears, not just the impacts from the current permit being reviewed.

leverage citizen science research which occurs in collaboration with researchers to establish baseline and variances in an ongoing voluntary process; have a dashboard to demonstrate evidence of impact

DEP should be extra vigilant about short term spikes in emissions; those pose great risks. Monitors must be where vulnerable people live and go to school. Punishments for violators must be meaningful.

Time limits on how long an application can be in review. And how many deficiencies can be accrued before the permit is rejected.

Determine cumulative impact of existing harm with proposed/applied for projects.

Work with developing the EJ community definition and the indicators. ID research (data) and verify it is accessible across all communities and include that definition in more than just the public participation policy

Address some concerns by communicating DEP programs and new regulations and the associated positive impacts they are/will have on EJ communities.

How can DEP address environmental justice concerns in addition to public participation in the permitting review process?

Be more aggressive on incomplete and inaccurate applications.. Failure and with a need to resubmit and payments for new review.

DEP could, where justified, install new monitors in EJ communities.

If a permit is granted in an EJ area, assign a portion of permit fees to a fund that will ultimately go back directly to the EJ community.

Ask permit seekers how they are going to be a "good neighbor" to the community. Not just job creation, but how are they going to reduce pollution burdens, manage stormwater, reduce carbon emissions, etc. for the area. What hazard plans to they have?

New permits in EJ areas need to have an overall benefit to quality of life in EJ area ...lowering pollution levels...

produce an annual performance report citing numbers and maps of complaints, permits submitted, permits withdrawn, community meetings, interventions

Incentivize "doing the right thing" for permit applicants

Can you provide the webpage with the triggers?

Do a few things much better instead of a lot of things marginally better.

DEP currently delineates EJ Areas based on race and income. What revisions would you recommend for identifying priority populations?

Substance Use Disorder/Overdoses

Brownfields/ abandoned industrial sites in a community (number or acreage) should be considered, and public health issues in a community, as well as race and incomeBlock group data would be better than tract level for census data

Consistency with any new federal plans would be best.

- An EJ community could be designated in reverse, that is, any community with a certain amount of aggregate pollution should be considered an EJ community on that basis.

health (days of work loss among population, health care service usage) and economic (employment opportunities and loss, property value) impact data, disaster responses associated specifically with environmental crisis

Since we already know that economically depressed communities are often underserved and under Represented. Do we run the risk of those communities becoming further depressed?

Any areas that have industrial uses or activities that raise pollution levels while lowering property values , quality of life and health

areas of nonresidential or mixed use development

How home values are relate to the average value in the city or county. With school funding based on home value most desirable locations have elevated property values.

DEP currently delineates EJ Areas based on race and income. What revisions would you recommend for identifying priority populations?

Is there anyway that we can become personally involved in the process of developing the EJ policy?

housing insecurity and housing quality is the biggest issue that affects folks that i work with directly. I dont believe they will be reached according to this frame work.

I would include over-burdened areas., which always tend to skew by race and income, but it's a good metric.