



Request for City Council Committee Action from the Department of City Coordinator

Date: June 22, 2015

To: Honorable Cam Gordon, Chair Health, Environment and Community Engagement Committee

Subject: City Comments on Minnesota Pollution Control Agency draft Environmental Justice Framework

Recommendations:

- Authorize submission of comments to the Minnesota Pollution Control Agency (MPCA) regarding the MPCA's draft Environmental Justice (EJ) Framework

Previous Directives:

Department Information

Prepared by: Kelly Muellman, Sustainability Office Approved by: Spencer Cronk, City Coordinator _____ Presenters in Committee: Gayle Prest, Kelly Muellman
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Financial Impact: None

Community Impact: None

Supporting Information:

On May 15, 2015 the MPCA released its draft Environmental Justice (EJ) Framework 2015-2018 for a two month comment period. The development of the framework involved an extensive two-year process that was led by a full-time MPCA staff and supported by self-identified environmental justice advocates in the community, as well as input from other state and local agencies.

The MPCA recently renewed its commitment to fully integrate its environmental justice policy and goal into their programs, regulatory decision making and activities. The agency's EJ policy and goal call for the fair treatment and meaningful involvement of Minnesota communities, ensuring that pollution does not have a disproportionate negative impact on any group of people. The MPCA's draft EJ Framework is a 16-page high level document that consists of a set of goals and strategies for reducing pollution, increasing livability, remedying past harm and preventing future harm in historically overburdened communities over the next 3-4 years.

The draft EJ Framework outlines how the MPCA will implement environmental justice goals, strategies, and tools in four key areas, including: regulatory programs; monitoring, assessment and consideration of cumulative impacts; prevention and assistance; and equity in rulemaking, policy development, and program implementation. The draft EJ

Framework also describes the resources that MPCA will rely on to support the proposed goals and strategies, including a screening methodology, public participation and community engagement, coordination with other agencies, measuring and reporting progress, and general implementation details.

The draft EJ Framework is supported by a set of implementation documents which outline the variables used to identify the Areas of Potential EJ Concern, describe the methods for meaningful community engagement, and outline proactive and reactive actions the MPCA may take to incorporate EJ into its core regulatory services.

On June 10, Sustainability staff convened a meeting with Health, Community Planning and Economic Development, Public Works, City Attorney, Neighborhood and Community Relations, and Finance and Property Services to discuss comments, questions and concerns that staff had on the draft EJ Framework. The final comment letter is a compilation of the shared input from all of these departments.

City Letter

The City's draft comments to the MPCA include a general appreciation for the agency's effort to create and content of the draft EJ Framework, as well as specific questions and suggestions for further consideration. The primary questions that the City asks relate to clarifying actions that the MPCA proposes or reasons for missing items, for example how the MPCA will quantitatively integrate "non-chemical stressors" and why it does not include contaminated land sites (e.g., Voluntary Investigation and Cleanup sites) in the environmental variables for screening areas of potential concern. The suggestions that the City offers for further consideration include adding a glossary, modifying the demographic variables for screening areas of potential concern, and addressing what additional resources will be allocated for the improved community and business engagement work and effective strategies for positive engagement.

Submitting comments is consistent with the City's vision and values of ensuring a pristine environment, where all people are safe, healthy and have equitable opportunities for success and happiness. Minneapolis is concerned about inequitable impacts on communities and the comments in this letter reflect that position and the general support for an EJ Framework.