Focus on Vulnerability

Integrating Human Rights into Planning for Climate Change

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DISCLAIMER

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No people should bear a disproportionate share of negative environmental consequences

Executive Order 12898 – to the extent permitted by law…federal agencies should address disproportionately high adverse impacts on minority and low income populations
Climate Variability Hazards

- SE Dangers: Drought, flooding, heat, hurricanes, and sea level rise
- Disproportionate impacts on poor and vulnerable populations
Climate Variability/Social Vulnerability

- Drought: impacts rural communities where survival depends on agriculture
- Heat: impacts poor and elderly, often indirect impacts such as increased domestic violence, disease
- Flooding: impacts poor living in flood plains on cheap land
Climate Variability/Social Vulnerability

- Hurricanes: many can not rebuild; cheaper housing more vulnerable to hurricane winds

- Sea Level Rise: lowest land areas in LA are populated by tribes; Miami Dade has large urban poor populations
Currently...

- EPA integrates EJ analysis into many programs
- EJ impact review generally not mandated in the environmental statutes
- Once identify the problems/impacts on EJ, then what?
CAA Example

Through CAA Permitting

- Non-attainment NSR permits ‘demonstrate benefits outweigh social costs…’ § 173(a)(5)
- EAB cases such as In Re Knauf Fiber Glass, require permitting authority to provide an EJ analysis in the record in response to comments
Climate Change Mitigation

- EPA Regulatory actions
  - Endangerment Finding
  - GHG Mandatory Reporting Rule
  - § 202 Mobile Source Rule
  - Renewable Fuel Standard (RFS2)
Cap and Trade

- The EJ movement believes cap and trade will hurt vulnerable communities by creating hot spots

- CA Global Warming Solutions Act (AB 32)
What should we do?

- How should EPA and other federal agencies view EJ when crafting climate change strategy?

- Climate change presents an opportunity to get it right.
First Steps: Reduce Vulnerabilities

- Identify vulnerable populations where risk of climate variability is high

- Craft adaptation strategies to respond to these fragile populations
Thoughts?

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