

Focus on Vulnerability

Integrating Human Rights into Planning for Climate Change

Elizabeth O'Sullivan
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Human Rights/Environmental Justice

- 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?

 Contact Elizabeth O'Sullivan at
osullivan.elizabeth@epa.gov

