

**Environmental Justice Advisory Board's  
Suggestions for expanding the Environmental Assessment  
Public Participation Procedures**

Page 2, Definition of local municipalities: There was a suggestion that the department be consistent with identifying the impacted community and/or municipality. The Environmental Justice Work Group Report suggests an analysis of the community within ½ mile of the proposed facility. The Environmental Assessment procedure considers municipalities within one mile. Regardless of the preferred distance, the analysis should include any census tracts that are partially or totally identified.

Page 3, General Principles: The department should include another principle that encourages meaningful and comprehensive public participation. The procedures in the Community Involvement Checklist (see attachment) should be implemented.

Page 4, Section 3. Other Agencies: The group suggested including correspondence from local governments. *The applicant should be required to submit all correspondence received from any Local, State or Federal agency contacted as part of the environmental assessment.*

Page 5, Third Paragraph: The group believes that public input is crucial throughout the permitting process (i.e. *Public input is critical in identifying and determining the extent of harms*). Therefore, it is suggested that this entire paragraph be re-worded to emphasize comprehensive public outreach and participation. This would be a good section to include the role of the Office of Environmental Advocate and elements from the Community Involvement Checklist. If after completing the checklist, the regional advocates, community relations and technical staff would be in a better position to gauge the community's awareness or position.

There was also a suggestion to require the applicant to notify the impacted community (U.S. mail) of any upcoming meetings or discussions about perceived harms and benefits. According to members of the group, there are tools that can identify the mailing addresses of the identified community. This effort should not be too expensive.

Page 8, First Paragraph: This paragraph is redundant. See comments for Page 5, Third Paragraph.

Page 8, Section 9. Social and Economic Harm: The group believes that this section should include more specific examples of social and economic harms. Perhaps the department can list some harms that have been identified during previous environmental assessments. There was also a suggestion to add the term "*cultural impacts*" to the list.

Page 9, Section 11. Department Response to the Applicant: Because the public has been involved throughout the permitting process, it seems appropriate that they receive notice of the outcome of the evaluation, along with the applicant.