



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF INTERNATIONAL
& TRIBAL AFFAIRS

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Andy Carey
Chair, U.S. National Advisory Committee
Executive Director
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Dear Mr. Carey:

On behalf of CEC Council member, Administrator Michael S. Regan, I thank you for the National Advisory Committee's (NAC) letter of advice of May 31, 2022. We appreciate the NAC's dedication and commitment to undertaking your charge and providing us with your valuable advice. In particular, we appreciate the NAC's comprehensive advice on the draft project description on *Air Quality Improvement for Environmental Justice (AQIEJ)*, as well as how to best integrate the concepts of climate change and environmental justice into the work of the Commission for Environmental Cooperation (CEC).

NAC Recommendations on the AQIEJ Project

Thank you for your recommendations regarding the AQIEJ project. As you know, this project aims to build partnerships that respond to community-identified poor air quality conditions from exposures to high levels of black carbon (BC) and particulate matter (PM_{2.5}) emissions in communities that potentially experience disproportionate environmental harms and risk and/or have environmental justice concerns. Please see below our responses to each recommendation:

1. *Improved Federal Agency collaboration to reduce wait times at the U.S.-Mexico Border to reduce truck emissions through expedited border crossings, unified cargo processing, and joint U.S.-Mexico inspections.* While we agree that this is a beneficial activity, it falls beyond the scope of this project.
2. *Refine focus of the Environmental Justice project to benefit the equitable and equal implementation of programs and services that support Canada, the United States, and Mexico.* The next stage of this project is to select locations and communities for implementation of the work, and shared points of entry would be considered at this stage.
3. *Develop more sophisticated approaches to infrastructure projects and*

- incorporate mitigation efforts at the forefront of the project instead of at the end. While there is not sufficient budget to pursue emission mitigation or infrastructure investments, the implementation phase of this project will consider pairing it with ongoing emission mitigation efforts to attribute the benefits of emission mitigation efforts.*
4. *Develop a mapping strategy for mitigation efforts across the three countries to better understand where mitigation efforts have succeeded and where improvements are needed.* The implementation phase of this project will review the cited black carbon project in Detroit and other existing efforts to understand current monitoring and focus for ways to enhance existing monitoring.
 5. *Integrate cultural competency awareness when working in tribal communities to implement strategies that consider local needs, challenges, and issues. You must meet them where they are and not implement a one-size-fits-all strategy.* The project will seek to engage the community where monitoring is deployed and will look to the suggested Tribal Air Monitoring Support Center success story to learn how to best advance the aims of this project.
 6. *Engage state and local officials when implementing Environmental Justice programs and include civil society organizations whenever and wherever possible.* The project will seek to engage the local government, community leaders, and relevant NGOs and philanthropies, and share best practices that result from the project.
 7. *Consider time and space characteristics when implementing studies to ensure impacts on entire community at all times of day.* The project group deliberated on adding an exposure study to this project, but it was agreed that this was not feasible with the current budget. Community groups will be engaged, and we will try to collaborate with any ongoing exposure studies, and work with community groups to act on environmental findings.
 8. *Leverage funding opportunities in philanthropic and nonprofit sectors to grow the funding pipeline to address Environmental Justice programs and services and leverage the grant funding opportunities of the CEC.* In the selected community, we will look for opportunities for greater collaboration with the public, private, and philanthropic sectors.
 9. *Engage local communities in environmental infrastructure projects from the beginning to ensure collaboration and reduce mitigation challenges, especially as they impact impoverished communities.* The project will seek to engage the community where monitoring is deployed.
 10. *Enact environmental accountability practices to ensure laws are enforced, mitigation efforts are implemented, and on-going monitoring is in place.* At the implementation phase of the project, we will consider pairing it with ongoing emission mitigation efforts to assess the benefits of different approaches

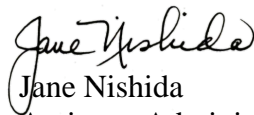
Please note that we have shared your specific recommendations for improving this project with the trilateral expert group designing it for further consideration.

NAC Recommendations on Incorporating Climate Change and Environmental Justice into the CEC Work

We also thank the NAC for your advice on integrating climate change and environmental justice into the CEC work, particularly under the 2021-2025 Strategic Plan priorities. You have identified the priority areas of Circular Economy and Sustainable Materials Management and Resilient Economies and Communities as particularly positioned to address both concepts. We agree that these two strategic priorities present great opportunities for work that addresses climate change impacts while supporting vulnerable communities as they adapt to those impacts. We also concur that reviewing current efforts would be beneficial as we plan and implement current and future work. We look forward to identifying specific opportunities for integration of these concepts into projects and initiatives as we plan future CEC work.

Once again, we thank you for the NAC's strategic and comprehensive advice regarding the AQIEJ project and integrating climate change and environmental justice into the CEC projects and initiatives. We look forward to working together with Canada and Mexico to continue addressing environmental and trade issues of common interest and look forward to your future advice.

Sincerely,


Jane Nishida
Assistant Administrator