

US EPA ARCHIVE DOCUMENT

August 24,2000

Ann Goode  
EPA Office of Civil Rights (MC 1201A)  
1200 Pennsylvania Ave. NW  
Washington DC 20460

RE: Title 6 Guidance

Dear Ms. Goode:

It is my understanding that EPA is revising its Title 6 Guidance regarding environmental justice issues and siting of facilities. It is my understanding that the new EPA Guidance will require scientific proof that the pollution causes a substantial increase in cancer risks and other health problems. The new Guidance also provides no appeals process for Title 6 decisions on complaints.

My comment is that if we wait for a company to pollute enough so that there is clear documentation of the harm of the company on the community, it is way too late for the residents of that community. It is unrealistic to expect that a vulnerable low income community is going to have the resources to conduct scientific studies to refute the "industry" studies of safety.

I am concerned about any changes that make it easier for companies to take advantage of low income minority or disadvantaged communities. It is the responsibility of the EPA and regulators to represent those people rather than the industry. There should be an appeals process for the decisions made through the process.

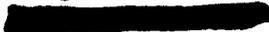
Here in Nevada we are very familiar with what happens when the federal government lies to the public (about nuclear testing) and the fatal result. If it is a "safe" industry, it ought to be safe enough to operate in the middle of a big city. If it passes the big city test, then it might be safe enough to operate in a rural low income community.

Thank you for considering my point of view.

Sincerely,



Abigail C. Johnson

  
Carson City, NV 89703

received  
8/29/00