



# Vulnerable Communities

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- Demonstration or description of opportunity for public comment on the initial submittal and meaningful engagement with stakeholders, *including vulnerable communities*, during the time in preparation of the initial submittal and the plans for engagement during development of the final plan. [40 CFR 60.5765(a)(3)]
- Both phases (initial submittal and final plan) require outreach to vulnerable communities [Initial Submittal memo at 3]

- The agency uses the terms “vulnerable” and “overburdened” in referring to low income communities, communities of color, and indigenous populations that are most affected by, and least resilient to, the impacts of climate change, and are central to our community and environmental justice considerations.  
[NFRM at 64848]

- Beneficial

- **Mitigating climate change:** “By reducing millions of tons of CO2 emissions that are contributing to global GHG levels and providing strong leadership to encourage meaningful reductions by countries across the globe, this rule is a significant step to address health and economic impacts of climate change that will fall disproportionately on vulnerable communities.”  
[NFRM at 64914]
- **Mitigating conventional air pollution:** “Conventional pollutants emitted by power plants, such as particulate matter (PM), SO2, hazardous air pollutants (HAP), and nitrogen oxides (NOx), will also be reduced as the plants reduce their carbon emissions. ... We thus expect an important co-benefit of this rule to be a reduction in the adverse health impacts of air pollution on these low-income communities and communities of color.”  
[NFRM at 64670]
- **Employment opportunities:** The electricity sector is, and will continue to be, investing more in RE and EE. The construction of renewable generation and the implementation of EE programs such as residential weatherization will bring investment and employment opportunities to the communities where they take place.  
[NFRM at 64915]

- **Detrimental**
  - **Generation shifts** (from Building Block 2) causing localized increases in operation and therefore pollution [NFRM at 64915]
  - **Employment losses:** We recognize that certain communities whose economies may be affected by changes in the utility and related sectors may be particularly impacted by the final rule. The EPA encourages states to make an effort to engage with these communities, including workers and their representatives in these sectors, including EE. [NFRM at 64915]
  - **Increases in electricity costs:** It is “important to ensure that to the extent there are increases in electricity costs, that those do not fall disproportionately on those least able to afford them.” (See Principle 6 of “10 Principles”) [NFRM at 64915]

## From Initial Submittal Memo:

- Providing public notice to potentially affected low income, minority and indigenous populations
  - Reaching out to residents within a certain distance of the affected EGUs [EJ Screening Report for the Clean Power Plan]
  - Using existing title V mailing lists maintained by the states for affected EGUs
  - Providing direct public notice to affected facilities and requesting that facilities disseminate the notice to employees
  - Providing public notice through different avenues such as the state agency website, public libraries or other public offices near affected EGUs, or other options intended to reach out to vulnerable communities
- Reaching out to local community organizations and/or organizations that advocate for vulnerable communities
- Providing public notice to local governments in areas where affected EGUs are located
- Providing public notice and consultation to potentially affected Tribal governments