

Rubbertown Emergency Action (REACT)

December 12, 2017

The Honorable Senator Mitch McConnell
317 Russell Senate Office Building
Washington DC, 20510

The Honorable Senator Rand Paul
167 Russell Senate Office Building
Washington DC, 20510

Re: Proposed Cuts to EPA's Staff and Programs Would Harm Louisville's Health and Safety, and Decimate Local and State Budgets

Dear Majority Leader McConnell and Senator Paul:

On behalf of our members and Rubbertown Emergency ACTION (REACT), we write today urging your action to protect funding and programs administered by the US Environmental Protection Agency (EPA) vital to our individual health and the health of people living in neighborhoods adjacent to Rubbertown, a cluster of Title V chemical facilities in West and Southwest Louisville. These neighborhoods are heavily impacted by multiple toxic chemicals and hazards.

REACT is a grassroots organization of residents living near or at the fencelines of a cluster of 11 chemical plants commonly referred to as Rubbertown. REACT works for strong laws to stop toxic air pollution from chemical plants; the protection of residents in the event of a leak, fire or explosion in a chemical plant or railcar; and full disclosure and easy access to information concerning the impact of Rubbertown facilities on residents living nearby.

The neighborhoods in West and Southwest Louisville are vibrant communities, but are also dealing with a legacy of environmental injustice, brownfields and contaminated industrial sites, and substantial economic development problems. These neighborhoods contain many heavy industrial manufacturing plants, and are also located near a power plant and a toxic landfill site. These facilities are adjacent to residential neighborhoods.

Louisville's Jefferson County has the fifth highest amount of hazardous air pollution in the entire United States, according to data on emissions reported to EPA's Toxic Release Inventory, suffering over 7 million pounds of toxic air pollution in 2013 alone.¹ This toxic burden has been slowly coming down, thanks in part to support from EPA staff and programs that could be significantly reduced or eliminated under the Administration's FY 2018 budget proposal.

Louisville, specifically our neighborhoods in West and Southwest Louisville, and the entire state of Kentucky, need ongoing support and engagement from EPA's professional staff in its regional and national offices, continued funding through its critical grant programs, and enhanced implementation and enforcement of the laws and rules that protect our air, water, soil, and health.

Rubbertown has had success beginning to reduce toxic air emissions and redevelop toxic sites to

¹ James Bruggers, Louisville among worst for toxic air emissions, Louisville Courier-Journal, September 17, 2015.

build a healthier community, progress only made possible with support from EPA's programs and staff, including its Brownfields and Environmental Justice programs.

I personally got involved when I went to a public meeting and learned for the first time that the terrible odors my family sometimes experienced and the health effects we saw in our community were probably because of the 11 or so chemical facilities commonly referred to as Rubbertown. I was determined to help reduce our exposure to chemicals. We've needed technical expertise to help us understand what we've been experiencing, and to be a science- and data-driven organization. Over the years, we have educated decision makers using our stories and data, and now they seek us out. We've gone from being seen as agitators to being valued as resource providers. We could not have made this transformation without support from many partners, including EPA staff and programs that cannot be replaced by community or state resources.

EPA regional and national staff have met with our community and local officials on several occasions, providing critical information, guidance, and support for our community's efforts to understand and reduce toxic emissions that impact our health and environment. Support from Environmental Justice staff and programs have been essential to our community's ability to understand the hazards we face and work toward solutions.

EPA provides approximately \$760,000 annually to the Louisville Metro Air Pollution Control District to support permitting and air monitoring (over 15% of the agency's budget). As many as 1 in 3 Kentucky Department for Environmental Protection staff – including those working on air quality, water quality, and toxic cleanups – are funded by EPA.²

Over the past ten years, EPA has provided over 400 grants (totally more than \$600 million) for specific projects in Kentucky, including improvements to drinking water systems and air quality monitoring.³ Just last month, EPA started an important Next Generation Emissions Measurement (NGEM) Demonstration Study to help detect and address fugitive (unplanned) toxic air emissions from Rubbertown facilities.⁴ It's unclear whether this program could continue in future years if the Administration's massive proposed cuts to EPA's budget are adopted.

EPA's Brownfields program has directly benefited our community, and has provided important benefits for our whole state. This program, which would be eliminated under the Trump Administration's proposal for EPA's FY 2018 budget, is a rare source of grants that helps Louisville and Kentucky safely redevelop old industrial sites. Kentucky has received \$12.9 million in EPA brownfields grants to help assess and remediate contaminated properties in the last 11 years, removing hazards, improving health, and supporting redevelopment.⁵ Each \$1 of EPA Brownfields funding leverages an average of \$16.11 in other spending, and each \$100,000

² James Bruggers, Kentucky braces for big Trump EPA cuts, Louisville Courier-Journal, March 3, 2017.

³ James Bruggers, EPA spending freeze could hurt Ky., Ind., Louisville Courier-Journal, January 25, 2017.

⁴ US EPA, Rubbertown Next Generation Emission Measurement Demonstration Project Provides Innovative Approaches to Protecting Air Quality, September 2017, at https://www.epa.gov/sites/production/files/2017-09/documents/rubbertown_ngem_external_science_in_action_final_draft_090517.pdf.

⁵ Bruggers, March 3, 2017.

of brownfields spending on assessment, cleanup, and loans creates an average of 8.5 jobs.⁶

EPA Administrator Scott Pruitt has stated his intention to abandon much of the EPA's role in protecting public health and the environment, which we depend on for a healthy economy and communities, and shifting these responsibilities to already underfunded and overburdened state budgets. Not only can most states not possibly absorb these costs and duties, a national approach to key issues – including environmental justice – makes sense, and the opportunities and benefits of these programs should be available to all Americans, not just those who live in the wealthiest states. In fact, EPA's current Environmental Justice Strategy (EJ 2020) specifically recognizes “the need for a more systematic approach to reducing environmental and health disparities for minority, low-income and tribal populations and improve the air, water and land in the nation's most overburdened communities” and includes national goals and activities.⁷

Louisville and Kentucky could not possibly take on these costs and programs, and their reduction or elimination would directly harm the health, environment, and economy of our city and state. Any attempt to recreate federal programs from scratch on a state-by-state and city-by-city basis would be costly and inefficient, and would never be attempted in most places.

EPA's staff, programs, and grants, including its Brownfields and Environmental Justice programs, provide concrete, irreplaceable support to Louisville, West and Southwest Louisville in particular, and the state of Kentucky, and bring substantial health and economic benefits that far outweigh the costs. Maintaining these programs and grants through the federal EPA is logical, financially efficient, and more effective than slashing these budgets and pushing responsibility onto states.

We urge to you reject all of the Administration's proposed cuts to EPA's FY 2018 budget, and ask you to support robust continued funding for these critical health and environmental programs, including the Environmental Justice program, the Brownfields program, and grants to cities, states, and communities for both special projects and ongoing “categorical” grants to develop and implement environmental programs.

Thank you for your consideration of this request, and for your action in support of the important programs EPA administers for the health and economic prosperity of your constituents.

Sincerely,

Eboni Cochran
Co-Director
Rubbertown Emergency ACTION (REACT)
4304 Winnrose Way

⁶ US EPA, EPA Brownfields Funding Announced for Four Communities in Kentucky, May 31, 2017, at <https://www.epa.gov/newsreleases/epa-brownfields-funding-announced-four-communities-kentucky>.

⁷ U.S. Environmental Protection Agency, EJ 2020 Action Agenda: EPA's Environmental Justice Strategy at <https://www.epa.gov/environmentaljustice/ej-2020-action-agenda-epas-environmental-justice-strategy>, and National EJ Challenges at <https://www.epa.gov/environmentaljustice/ej-2020-national-ej-challenges#existing>.

Louisville, KY 40211

cc: The Honorable Charles Schumer, Minority Leader, U.S. Senate
The Honorable Thad Cochran, Chairman, U.S. Senate Appropriations Committee
The Honorable Patrick Leahy, Vice Chairman, U.S. Senate Appropriations Committee
Members of the U.S. Senate Appropriations Committee
Members of the U.S. Senate