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# **Environmental Financial Advisory Board**

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## **URBAN ENVIRONMENTAL POLICY: STEPS TOWARD ENVIRONMENTAL EQUITY, REDUCED ENVIRONMENTAL AND HEALTH RISKS, AND URBAN REVITALIZATION**

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*This advisory has not been reviewed for approval by the U.S. Environmental Protection Agency; and hence, the views and opinions expressed in the advisory do not necessarily represent those of the Agency or any other agencies in the Federal Government.*

**March 1993**

MAR 24 1993

Honorable Carol M. Browner  
Administrator  
U.S. Environmental Protection Agency  
Washington, DC 20460


Dear Administrator Browner:

On behalf of the Environmental Financial Advisory Board (EFAB), we are very pleased to transmit to you the EFAB Urban Environmental Policy Advisory. This Advisory is designed to provide EPA with a creative financing strategy for addressing the pressing environmental concerns facing inner city communities across the nation. We believe the recommendations presented here are particularly timely for the Agency in that they will help fulfill a compelling national need for environmental improvements in our urban areas and at the same time have an important effect on furthering the President's economic stimulus program.

The Board has concluded that while environmental infrastructure improvements cannot solve all the ills of America's cities, they do offer one clear route to aid economic revitalization of our inner cities. The rehabilitation of environmental infrastructure in urban areas can help build economies that attract private investment to the inner cities, offer job opportunities to its residents, and generally improve the urban quality of life. Specifically, the Board suggests that you present to the President a proposal to issue an Executive Order that would enable:

- o the designation of certain areas, with the concurrence of the applicable Governor, as urban Environmental Enterprise Zones (EEZs);
- o the redeployment of resources from EPA and other federal agencies to approved EEZs; and
- o the training of an urban conservation corps to sustain environmental improvements and promote economic redevelopment.

We believe that these actions merit consideration by senior domestic policy officials currently engaged in the economic and environmental challenges facing our nation. We and the EFAB Executive Committee are available at your convenience to discuss the Advisory and to provide any further analyses you may require.

  
Richard Torkelson  
Chair, Environmental Financial  
Advisory Board

  
Frieda K. Wallison  
Vice Chair, Environmental  
Financial Advisory Board

cc: Herb Barrack, EFAB Executive Director

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## **EXECUTIVE SUMMARY**

In 1992 riots broke out in Los Angeles, California, and the fear of urban disturbances elsewhere was in the air. As a result, the Environmental Financial Advisory Board (EFAB) carried out a study to recommend economic and financial strategies to enhance environmental equity in America's urban centers, reduce disproportionate environmental risks facing urban areas, and promote urban redevelopment. This Advisory, drafted by a committee of urban officials and infrastructure finance professionals, presents our recommendations.

### **THE AGENCY'S AGENDA TO ADDRESS ENVIRONMENTAL EQUITY**

Since 1991, EPA has initiated several new programs with minority partners in academia, the corporate community, and the nation's cities. In February 1992, EPA's Environmental Equity Workgroup concluded that while available data are limited, low-income and minority communities tend to experience greater exposure to environmental pollutants than do white, high-income groups. In some instances -- particularly with respect to unacceptably high lead levels in African-American children -- the data are clear.

### **AMERICA'S URBAN COMMUNITIES FACE DISPROPORTIONATE ENVIRONMENTAL RISKS**

Urban pollution poses environmental and public health risks for America's urban communities that may be more significant than elsewhere in the nation. Whether these conditions lead to increased incidence of disease or death remains a matter of scientific debate. Yet degraded urban environments -- land fouled with toxic waste, garbage in urban watersheds, asbestos in abandoned inner-city buildings, and heavily polluted air -- suggest pathways for exposure to a great number of people living in densely settled clusters.

### **URBAN ENVIRONMENTAL PROBLEMS DAMPEN ECONOMIC DEVELOPMENT**

While environmental solutions make no pretense of solving all the social and economic problems facing the nation's cities, they offer one clear route to economic revitalization. The causes of distress in urban areas are complex and are generally linked to high unemployment, limited job opportunities, low income, and a host of related social problems. Left alone, these conditions tend to worsen -- unemployment results in reduced income, which results in reduced investment, which results in reduced jobs, and so on.

Direct solutions to these problems are necessary. But so too are solutions that address collateral needs of urban areas, such as environmental improvement. In previous Advisories, EFAB identified a strong relationship between environmental infrastructure and the health of the private economy. In this Advisory, we suggest that environmental improvements can help build urban economies that attract private investment, offer employment to urban populations, and generally improve urban quality of life.

## **STEPS EPA CAN TAKE TO IMPROVE THE URBAN ENVIRONMENT AND URBAN ECONOMICS**

Recognizing that EPA has a high stake in the welfare of the nation's cities, EFAB urges the EPA Administrator to present to the President, a proposal to enable by Executive Order:

1. The Administrator of EPA, with the concurrence of the applicable Governor, to designate certain areas as Urban Environmental Enterprise Zones (EEZs);
2. EPA and other federal agencies to redeploy resources as investments in approved EEZs; and
3. EPA and other federal agencies to train an urban environmental workforce to sustain environmental improvements and promote economic revitalization.

### **Establish Urban Environmental Enterprise Zones**

EEZs would be one type of economic development zone, within which environmental improvement activities would be targeted with the intent of reducing environmental and public health risks, and thereby, attracting public and private investment in income and employment producing enterprises. With the applicable Governor's concurrence, the Administrator of EPA would designate certain areas as EEZs based on social, economic, and environmental criteria. EPA could convene minority urban leaders in an advisory capacity to help design the designation/concurrence process and criteria.

### **Redeploy EPA and Other Federal Resources as Investments in EEZs**

Once established, EEZs would be eligible for priority EPA and other federal agency funding. To encourage such targeting, EPA could adjust its priority setting protocols associated with a range of loan, grant, and demonstration project programs to account for disproportionate urban environmental risks. EPA guidance could encourage receipts from the sale of grant-funded wastewater treatment plants to be reinvested in high-priority EEZ environmental projects. EPA would also coordinate the redeployment of other federal resources to EEZs.

### **Train an Urban Workforce to Sustain Environmental Improvement and Promote Economic Revitalization**

The Administrator should take two steps to train a reliable urban workforce -- a key link between environmental investments and the urban economy. First, EPA should proceed with its proposed Retired Environmental Volunteer program and direct initial tasks to EEZs. Second, EPA should create an Urban Environmental Conservation Corps to train a remediation workforce comprised of EEZ residents to remediate urban sites for productive reuse.

# **URBAN ENVIRONMENTAL POLICY: STEPS TOWARD ENVIRONMENTAL EQUITY, REDUCED ENVIRONMENTAL AND HEALTH RISKS, AND URBAN REVITALIZATION**

## **I. INTRODUCTION**

In May of 1992, urban unrest once again reminded the nation of the critical needs facing our cities. Attention was drawn to a complex web of urban problems including high unemployment, limited job opportunities, low income, and a host of related social problems.

### **Environmental Equity**

In 1991, EPA began a series of activities to address the issue of environmental equity. First, the Agency strengthened its relationship with minority academic institutions by forming a Minority Academic Institutions (MAI) Task Force comprised of senior managers and presidents of Historically Black Colleges and Universities and Hispanic Associated Colleges and Universities. Second, following the MAI Task Force recommendations, EPA now offers scholarships to college-bound minority students in math and the sciences, employment after graduation, EPA-faculty exchanges, and joint development of environmental curricula. Finally, EPA established and funded two new academic Centers of Excellence at minority colleges.

In 1992, EPA convened an Environmental Equity Workgroup -- 40 Agency professionals were assigned to identify environmental risks disproportionately borne by low-income and racial minorities. The Workgroup concluded that while available data are limited, some low-income and minority communities experience greater exposure to environmental pollutants than do white, higher-income groups. In particular, it found a much higher percentage of African-American children have unacceptably high levels of lead in their blood than do children in the general population.

Also in 1992, after the formation of the Environmental Equity Workgroup, the Agency established the Office of Environmental Equity in the Office of Administration and Resources Management. This Office serves to centralize the efforts of the Agency in dealing with the environmental impacts on racial minority and/or low-income populations. Its strategy is to have a cross-media, risk-reduction approach in making equity information more accessible to EPA's constituency, including state and local governments, interested outside parties, and individuals EPA offices.

### **Urban Environmental and Health Risks**

Urban air quality is undeniably worse than elsewhere in the nation. While patterns vary across cities, other acute urban environmental risks include: land contamination from underground tanks and abandoned waste disposal sites, asbestos in buildings, garbage in

urban watersheds, lack of landfill or other solid waste capacity, unmanaged stormwater and combined sewer overflows (CSOs), and toxics such as lead in paint or in water supplies.

### **The EFAB Challenge**

Acknowledging these problems, EFAB carried out a study to formulate an urban environmental finance strategy designed to help remedy urban environmental inequities. Environmental improvements, in turn, would build urban economies that attract private investment, offer employment to inner-city populations, and generally improve the economic quality of urban life. This Advisory, the product of an EFAB committee of urban officials and infrastructure finance professionals, offers our initial recommendations.

### **The Policy Context**

In some cities, the urban condition is comparable to the cycle of poverty that characterizes developing countries. Depressed economies offer limited opportunities for employment and income, dampen private investment, and often result in socially unacceptable conditions. Left alone, these conditions tend to worsen, not improve -- unemployment results in reduced income, which results in reduced investment, which results in reduced jobs, and so on. This cycle can be broken only with substantial change; small, incremental investments are overridden by the power of the cycle.

This paper makes no pretense that environmental improvement can solve all the ills of America's cities. These are more deeply rooted in more fundamental cycles of industrial growth and decline, in the neglect of our governance structures, and in the legacies of inherited poverty and discrimination. Many federal, city, and state programs are aimed more directly at urban problems; these merit, and will likely receive, careful consideration within their own policy contexts. Further, EFAB recognizes that environmental programs are already burdened heavily with existing obligations -- many of which aid urban communities by virtue of population or source-based priorities.

**Environmental Goals Suggest a Role for a National Urban Environmental Program.** The dual goals of contemporary environmental policy, promoting environmental equity and risk-based priority setting, offer evidence that an urban environmental investment strategy is on target. Data on the incidence of health effects among different race and income levels are poor. Yet, measurements of ambient environmental conditions clearly put urban residents at greater risk of exposure to environmental contaminants than the general population -- and even at greater risk than residents of poor, rural communities. On the matter of reducing disproportionate urban environmental risks, the relationship between exposure to environmental contaminants and incidence of disease across racial or income groups is not well understood. Yet, toxicologists recognize that high or sustained exposure to environmental pollutants are two conditions generally correlated with atypically high rates of disease (another is susceptibility of the target population).

**Environmental Investments Also Help Reduce the Cost and Risk of Urban Revitalization.** Business investment in general is predicated on sound environmental infrastructure -- e.g., unpolluted land on which to operate, adequate supplies of clean water as inputs to production, and waste treatment facilities to handle residuals. Urban areas, however, often have more than their share of environmental problems and these inhibit economic development.

Thus, environmental programs are essential for economic development in most urban areas. Options in this paper are meant to reduce the cost and risk of business investment in distressed urban areas by: (1) cleaning up environmentally polluted sites to permit reuse by new investment projects, and (2) constructing environmental infrastructure to support new private investment.

**EPA's Role in Improving Urban Economics.** In the context of EPA's jurisdiction, addressing the urban condition is a natural activity that follows the Agency's concerns for environmental equity and reducing residual risk. In February 1992, for example, the Agency's Environmental Equity Workgroup concluded that:

...the Agency should incorporate considerations of environmental equity into the risk assessment process...EPA should selectively review and revise its permit, grant, monitoring, and enforcement procedures to address high concentrations of risk in racial minority and low-income communities.

The Administrator could broaden the appeal of an EPA effort to address environmental equity and reduce urban environmental risk by leveraging the relationship between a clean environment and a productive economy. In particular, the Agency could help draft or otherwise support an executive order that would enable the Administrator to:

- Establish Urban Environmental Enterprise Zones, with the concurrence of the applicable Governor;
- Redeploy EPA and other federal resources to invest in them; and
- Develop local human resources to sustain urban revitalization.



## **II. ESTABLISH URBAN ENVIRONMENTAL ENTERPRISE ZONES BY EXECUTIVE ORDER**

The EFAB urges the Administrator to present to the President, a proposal to enable by Executive Order, the Administrator to designate certain areas as Urban Environmental Enterprise Zones (EEZs). These designations would occur with the concurrence of the applicable Governor. Once designated, the zones will focus the Agency's activities to promote environmental equity and reduce disproportionate urban environmental risks. This policy also would have considerable potential to promote urban revitalization.

The Executive Order would further direct EPA to chair an inter-agency task force to coordinate analogous environmental investment activities in other federal agencies including the Corps of Engineers, the Department of Transportation, the Department of Commerce, the Small Business Administration, and others, as appropriate.

### **What is an Environmental Enterprise Zone?**

Environmental enterprise zones would be one type of economic development zone, within which, environmental improvement activities would be targeted with the intent of reducing urban environmental and public health risks, and thereby attracting public and private investment in income and employment producing enterprises.

The EPA Administrator could designate any area as an EEZ on the basis that:

1. The area is already designated an economic or housing development enterprise zone under the auspices of a formal federal, state, or local program, and contain, or be affected by, environmental pollution that constitutes a substantial impediment or disincentive to accomplishing the purposes for which the zone was created (e.g., economic development, creation of affordable housing). The sources of pollution may exist within the zone itself (e.g., a hazardous waste site or an asbestos-laden building) or may affect the zone from outside its boundaries (e.g., a nearby industrial facility that emits air pollutants); or
2. The area is characterized by aging or otherwise inadequate environmental infrastructure.

The purpose of designating an environmental enterprise zone would be to provide assistance in eliminating, remediating, or mitigating the environmental pollution that either constitutes an impediment to accomplishing the economic development goals of the zone or creates inequitable levels of exposure.

Where the area is designated under the economic development criteria (# 1 above), assistance available under this program would be in addition to the forms of assistance provided by federal, state, or local governments as a result of designation as an economic or housing development enterprise zone. Such additional assistance would not diminish the types or amounts of assistance otherwise available.

### **EPA'S Role in EEZ Designation**

EFAB recommends that the Administrator consider EPA's role in designation of urban Environmental Enterprise Zones. Alternative Agency functions could include:

- Establishing eligibility criteria for EEZ designation;
- Establishing an advisory committee of minority and urban interests to help develop and monitor the EEZ program;
- Holding town meetings to facilitate designation and set priorities;
- Expediting environmental review processes to reduce imminent exposure and reduce private investment risks; and
- Encouraging states to adjust priority setting in their own environmental programs to boost investment in EEZs.

**Establish Eligibility Criteria for EEZ Designation.** Before any directed programs can be initiated, EPA must establish criteria and standards for designating urban areas as EEZs. Criteria would address impairment of economic development goals, ambient urban environmental conditions, and the condition of environmental infrastructure. EPA could consider criteria to identify distressed areas that would be eligible for special environmental programs. This could include social indicators such as percentage of 11th grade students free of involvement with illicit drugs and teen pregnancy, quality of life criteria such as air quality, availability of affordable housing, health care access, and economic criteria such as tax burden and developable industrial land.

**Establish an Advisory Committee of Minority and Urban Interests to Help Develop and Monitor the EEZ Program.** As part of EPA's on-going efforts to seek out minority community leaders to participate in all its activities, the Agency could form an urban environmental advisory committee as a subcommittee to an already existing EPA advisory committee which has similar goals and objectives. The committee would be charged with helping develop EEZ designation criteria and generally participating in EPA review of the EEZ program as it matures. This would acknowledge that many of the potential EEZs are predominantly populated by minorities and that effective policy planning requires representation of minority concerns and perspectives on a regular basis.

**Hold Town Meetings to Facilitate Designation and Set Investment Priorities.** EPA could emphasize public participation to identify areas of community concern through organized meetings at the community level similar to the Baltimore forum organized by Morgan State University in June 1992. Effective remediation of urban problems requires participation of those affected, and the residents of the distressed areas are in a good position both to identify problem areas and to support programs facilitating the needed changes. These town meetings could help in the designation process and, after designation, in identifying the highest risk problems within EEZs.

**Expedite Environmental Review Processes to Reduce Environmental Exposure and Stimulate Private Investment.** Delays in regulatory review processes may result in unnecessary exposure to environmental pollutants. From an economic perspective, they are costly to private investors since resources are tied up without generating income. In conjunction with relevant state and local authorities, EPA could take steps to minimize start-up costs for private investors in designated urban zones through expedited environmental review processes.

Expedited review would shorten the period of uncertainty faced by investors and significantly reduce lag between inception and profitability for private investors without in any way relaxing environmental standards. This could be aided by a "one-stop shopping" approach, based on coordination among the public agencies involved in the review process and consolidation of activity at one location such as the state office most involved currently in review.

**Encourage States to Adjust Priority Setting in their Own Environmental Programs to Boost Investment in EEZs.** EPA could encourage states to earmark funds for environmental programs in EEZs by adjusting project ranking systems to recognize special urban needs and thus encourage redeployment of resources in state-level programs. This option would foster state actions analogous to those suggested for the federal level.

### **III. REDEPLOY EPA AND OTHER FEDERAL RESOURCES TO INVEST IN ENVIRONMENTAL ENTERPRISE ZONES**

The Administrator should consider a range of actions that EPA can take unilaterally to target resources to designated EEZs. In addition, the Agency should explore, through the inter-agency task force called for in the Executive Order, ways to work with other federal agencies to redirect their resources appropriately to EEZs.

These options may require a longer lead time to set up, a longer period of operation, and more resources to implement; some may require administrative and/or statutory changes, or budgetary reallocations. These options focus on redeployment of existing resources -- within agencies and programs or between programs but within the existing federal budget -- to improve environmental conditions and promote generally increased investment in targeted urban areas. Options include:

- Adjust priority setting protocols to redirect federal environmental resources to EEZs,
- Earmark environmental fines and penalties for environmental investments in EEZs,
- Encourage states to use SRF funds to finance eligible wastewater treatment facilities that benefit an EEZ, and
- Allow receipts from the sale of EPA grant-funded assets to be reinvested in urban environmental projects.

**Adjust Priority Setting Protocols to Redirect Federal Environmental Resources to EEZs.** Without changing the role of federal agencies or their mandates, EPA could target its own resources and work with other federal agencies to give greater emphasis to investments in EEZs. Potentially appropriate EPA programs include wastewater treatment grants (to the extent that these grants continue), pollution prevention grants, the Superfund hazard ranking system, Section 319 (of the Clean Water Act) grants for non-point source program development, and a range of pilot project and demonstration grants in air, water, and solid waste.

The Army Corps of Engineers could be especially active under this option by giving high priority to water resource programs in specifically designated urban areas. Examples for which the Corps would be particularly well-suited include programs to clean-up urban shorelines, establish urban river and lake recreational areas, and rehabilitate urban stormwater drainage and CSO systems. Environmental programs in other agencies, such as highway trust funds administered by the Department of Transportation, could be similarly restructured to accelerate the implementation of pending projects in EEZs.

**Earmark Environmental Fines and Penalties for Environmental Investments in EEZs.** Currently, receipts from environmental enforcement fines and penalties are deposited in the General Fund of the U.S. Treasury or similar state treasuries. EPA and the states could support changes in legislation or administrative conventions that would earmark fines and penalties for environmental infrastructure investments and programs in EEZs. The funds could be directed to public investments or leveraged in public-private partnerships for environmental infrastructure.

**Encourage States to Use SRF Funds to Finance Eligible Wastewater Treatment Facilities that Benefit an EEZ.** Currently, states contribute 20 percent and the federal government 80 percent of the funds for state revolving funds (SRFs) for wastewater treatment facilities. EPA should encourage and support states using SRF funds to finance eligible wastewater treatment facilities where an EEZ would benefit. Further, the Agency should examine the option of allowing states to invest SRF funds in other environmental infrastructure to support economic development in these targeted urban areas.

**Allow Receipts from the Sale of EPA Grant-Funded Assets to Be Reinvested in Urban Environmental Projects.** An executive order on infrastructure privatization allows local jurisdictions to retain most or all of the proceeds if they sell or refinance federally grant-funded infrastructure. EPA could provide EEZ governments authority to reinvest proceeds from the sale or refinancing of EPA grant-funded wastewater treatment facilities in any high-priority environmental project. This would divert payments from the general fund back to environmental investments in the public interest, thus retaining the spirit of the original grant program.

#### **IV. TRAIN AN URBAN WORKFORCE TO SUSTAIN ENVIRONMENTAL IMPROVEMENTS AND ECONOMIC REVITALIZATION IN EEZS**

A reliable, well-trained urban workforce constitutes one of the key links between environmental investments and the urban economy. EFAB recommends that the Administrator consider the following steps to train an urban environmental workforce:

- Proceed with EPA's Proposed Retired Environmental Volunteer (REV) Program; and
- Establish An Urban Conservation Corps (UCC).

**Proceed with EPA's Proposed REV Program.** The REV -- Retired Environmental Volunteers -- program is a proposed EPA program involving retired and retrained engineers to help targeted areas to assess their environmental problems and to create the preliminary design of a program to remedy these problems. EPA could begin the REV program immediately by reviewing existing volunteer programs such as SCORE (Service Corps of Retired Executives) and establishing REV as a pilot program, based in part on such reviews. Problem assessment and preliminary program design by REV participants could be particularly useful as a first step in soliciting public funding for environmental investments in the EEZs and encouraging private investment. Experienced REV leaders could, in turn, begin to train others within the community to build the resident skills base.

**Establish an Urban Conservation Corps (UCC).** This option has two objectives: train a remediation workforce comprised of EEZ residents, and remediate urban sites for productive reuse. The training component would help local residents obtain the skills needed for long term employment in the environmental field. Worker training centers might be part of an inter-agency program among EPA and the Departments of Defense and Energy under UCC management to create a pool of qualified workers, requiring financial commitment from the federal and/or state and local governments in the form of tax incentives, land grants, and/or direct allocations. Alternatively, the UCC could address the problems of the urban watershed, establish park and recreational areas, and prepare abandoned urban sites for commercial or industrial re-use.

Well-suited for structure as a public-private partnership, the UCC would take title, clean-up the site (trash, toxics, asbestos, etc.), and sell the previously contaminated sites that had been laying dormant because the owners did not have the incentive or the funds to undertake remediation. Current owners would be supportive because they would be relieved of environmental liability; the local area and government would be served because non-productive land would be transformed into a tax-paying business site; and local labor force would be gaining experience in a new skill that would be marketable in a broader market.