

Demos

Frontlines Climate Justice

Executive Action Platform



The development of the Frontlines Climate Justice Executive Action Platform was disrupted, like everything else in 2020, by the COVID-19 pandemic. The enormous human toll of this disease—the infections and deaths, first and foremost, as well as job losses in the tens of millions—cannot be overstated. However, like multiple climate disasters, such as wildfires in the West and hurricanes from Ike to Katrina to Sandy, Harvey, and Maria, COVID-19 is a “natural disaster” in name only. The unmistakable and tragic effects of this pandemic include disproportionate infections, fatalities, and job losses for people of color, but these effects are strictly human-made—by inaccessible health care and other public policies, decades of disinvestment in poor communities, employment discrimination, and much else.

Among many human-made factors to recognize in this crisis, this Platform stresses the role of environmental racism and the need for environmental justice. Poor air quality, which is concentrated in communities of color, correlates closely with chronic respiratory and other health conditions that increase risk for COVID-19 fatality. A recent [Harvard public health study](#) of more than 3000 counties found a clear correlation between exposure to higher rates of particulate matter (soot) and COVID-19 death rates. [Early data](#) on the demographics of COVID-19 have borne out exactly what could be predicted in a country where the poorest people, many without access to quality health care, are often living in the most polluted places. This pandemic also foreshadows similar but potentially more frequent public health crises to come, without bold and urgent action on climate change. The health-related impacts of climate change include greater risks of food- and water-borne illnesses and [infectious diseases](#).

COVID-19 is a wake-up call for many things—including the need for much greater funding for frontline health care workers and emergency response preparation, moving toward a fully public health insurance system, and plugging vast holes in the social safety net, from paid sick leave to unemployment insurance. But environmental injustice is in many ways the longest-standing problem contributing to the peril of poor communities and their extreme vulnerability in the face of public health crises. We hope this Frontlines Executive Action Platform can be an anchor for organizing people to demand bold action by the executive branch in 2021 and beyond—on climate change broadly, but especially in support of frontline community needs and priorities in the climate crisis.

Preamble

As communities across the country, as well as countless people all over the world, face accelerating impacts and risks of climate change, federal, state, and local leadership in the United States is critically important for advancing immediate and aggressive climate action in public policy.

The science shows we no longer have the luxury to act incrementally. We must rapidly transform every sector of society if we are to limit global warming to 1.5 degrees Celsius. But urgent action on climate change cannot come at a price of expedience and further sacrifice for frontline communities. Frontline communities are primarily communities of color, indigenous communities, and struggling working-class communities most impacted by fossil fuel pollution and climate change—which are all the more vulnerable due to historic and continuing racism, segregation, and socioeconomic inequity.

In tackling the urgency of the climate crisis, prioritizing the most impacted communities for the protections and benefits of an economy-wide renewable energy transition is a moral imperative. This is, in large part, the meaning of a “just transition.” The economic transition we need to reverse the climate crisis must not leave behind impacted communities and workers. Racial and economic equity must be at the core of all climate solutions.

The executive branch can set the stage for a transformative climate justice agenda by taking immediate action at this intersection of climate, racial justice, and economic transformation. The Frontlines Climate Justice Executive Action Platform speaks to this opportunity by identifying regulatory rulemakings and other executive actions to advance an equitable climate agenda from day one. While major legislation in many areas will ultimately be needed to advance a bold federal agenda of climate action, this platform proposes a set of actions the executive branch can take without new legislation, major new appropriations, or other congressional authority. However, many of the proposed executive actions can be harmonized with, be complementary to, or set a direction for statutory advancement of transformative climate action when that becomes possible.

This platform identifies actions in 4 basic categories that speak to the policy work and movement-building that frontline leaders in the climate movement have developed over many years, as they have forged a clear vision of equitable and resilient social and economic transformation:

1. **Environmental Justice:** Protecting frontline communities from continuing harms of fossil fuel, industrial, and built environment pollution.
2. **Just Recovery:** Ensuring just and equitable recovery from, and resiliency against, climate disasters.
3. **Climate Equity Accountability:** Elevating equity and stakeholder decision-making in federal climate rules and programmatic investments.
4. **Energy Democracy:** Remaking the monopoly fossil fuel energy system as a clean, renewably-sourced, and democratically-controlled commons.

In each of these areas, the platform presents a policy outline of possible rulemakings, executive orders, or other presidential actions that, taken together, aim to put frontline needs and priorities at the center of climate policy, including empowering grassroots stakeholders to be decision-makers in the process.

This platform builds on the hard-fought history of environmental justice advocacy that [escalated](#) in the 1980s, launched a [principled](#) national movement in 1991, and was formally recognized in federal policy in 1994 with President Clinton's historic [Executive Order 12898](#). E.O 12898 requires federal agencies to develop strategies for "achieving environmental justice," but even by its own limited mandate, it has not been enforced, and frontline communities now face climate change impacts that only compound ongoing racial disparities in pollution exposure and fossil fuel harms.

Taken together, the actions recommended in this platform address continuing disparities, establish greater accountability for a just transition, and lay groundwork for systemic changes needed to end fossil fuel dependency and build a just and equitable renewable energy future. In these key respects, it is inspired by the principled vision put forward by the [Equitable and Just National Climate Platform](#), and aligned with the Climate Justice Alliance's Just Transition: A Framework for Change. It also respectfully acknowledges the place of Native leadership in a just transition, as formulated in the [Indigenous Principles of a Just Transition](#). This platform also com-

plements proposed executive actions in the [Climate President Action Plan](#), including supply-side restrictions to limit fossil fuel extraction, economy-wide greenhouse gas (GHG) mitigation standards, and Department of Justice intervention to protect non-violent climate change activists from criminalization by states and localities, to pursue significant cases against environmental racism under civil rights laws, and to investigate and pursue, or otherwise support, civil and criminal lawsuits against fossil fuel companies. All of that and much more is needed, but the focus of this platform is specifically on the needs and priorities of frontline communities in the face of climate crisis.

In the broader landscape, the emerging paradigm of a [Green New Deal](#) captures the scale and urgency of the climate crisis. However, a primary—and science-driven—focus on aggressive GHG reductions is not inherently equitable for communities facing disproportionate local pollution, largely from the same facilities and sources driving the climate crisis. There are many reasons for this, including that the most polluted communities will tend to be “last in line” for GHG reductions, because these reductions are likely to be the most costly. Longstanding and worsening political power imbalances also often determine who will be protected by, and who will benefit from, any public policy, including climate policy and related investments.

The promise of climate policy for frontline communities lies in targeted policy design that prioritizes protections, direct emissions reductions, job creation and other economic benefits, and resiliency gains for the most impacted communities, including greater control of decision-making—all of which animates the executive action platform that follows. It also lies in addressing deeply interconnected crises of housing affordability, gentrifying economic development, and financial extraction of labor, community, and natural resources. Those challenges cannot be solved by the executive branch on its own and will require extensive state and local action, major federal legislation in some cases, and massive public investment through appropriations, bonding, and other means.

In contrast with the promise, the peril of climate policy lies in deferment of and underinvestment in equitable and transformative solutions, and elevation of false solutions that put markets, unproven technology, and, ultimately, private investors, in charge of the transition—not the most impacted communities and the most equitable solutions.

Together, this understanding of the promise and the peril of climate policy is the vision of frontline leaders working in the hardest-hit com-

munities and regions, developed over many decades. This vision has been building from local action to regional and national networks and strategies, which have accelerated in the last several years. Many organizations representing frontline communities have led in this process. The [Gulf South for a Green New Deal Policy Platform](#) is one powerful example of a locally-driven and regional vision of climate justice for the most impacted communities.

Ultimately, winning a frontline climate action agenda starts with the vision of frontline leaders. Moving forward requires elevation of that leadership, grassroots power-building, and commitments of national allies and public officials to support the frontline vision and its policy components as a clear priority in the federal landscape in 2021 and beyond.

In the first 100 days of a new term, the executive branch could bring dramatic developments in federal climate policy. This executive action platform will help to ensure that, however bold in tackling climate change, federal climate policy is centered on advancing racial justice and ensuring a just and equitable economic transformation for the most impacted communities.

Summary of Executive Actions

The President of the United States should take the following actions:

ENVIRONMENTAL JUSTICE

- **Reaffirm Executive Order 12898, and Revise and Expand its Mandates.** Strengthen compliance criteria and cross-agency oversight with regard to the original directives of the Executive Order, and supplement original directives with new directives focused on climate change impacts that were not considered in the original Executive Order.
- **No Hotspots Rule.** By Executive Order, direct the Environmental Protection Agency (EPA) to establish rules and implement a No Hotspots Policy for reducing and avoiding local pollution and pollution disparities caused, worsened, or left unaddressed by climate and criteria pollutant mitigation policies, including but not limited to: pollution trading or other market-based mechanisms, and development, implementation, and enforcement of State Implementation Plans or other plans or regulations to meet the National Ambient Air Quality Standards or other air quality or greenhouse gas standards. The president should also prioritize congressional action to codify the strongest possible version of a federal No Hotspots Rule in statute.
- **Cumulative Impacts.** By Executive Order, direct EPA to require Cumulative Impact and Risk Analysis agency-wide, wherever it is applicable in policy- and decision-making; Cumulative Impact and Risk Analysis should have the purpose of assessing combined health effects of multiple environmental stressors in a given locale. In connection with establishment of a Climate Equity Accountability System (see below), the president should also direct the Office of Management and Budget to require similar use of Cumulative Impact and Risk Analysis by other agencies impacting frontline communities.

- **Energy Justice.** Direct the Department of Energy and the Department of Health and Human Services to develop an administrative rulemaking to require integration of policy goals and administration of low-income energy assistance and low-income energy efficiency programs, to ensure that payment assistance for energy-burdened households is bundled with application assistance for, and facilitated access to, weatherization and other energy efficiency upgrades (such as new appliances and heat pumps). The president should support programmatic linkage by prioritizing and pushing for congressional action to quintuple funding for LIHEAP and increase Weatherization Assistance funding to the same level.
- **Water Justice.** By Executive Order, direct EPA to develop a national safe drinking water action plan for community water systems regulated under the Safe Drinking Water Act (SDWA), more than 5,600 of which, serving nearly 45 million people, were found to be in violation of one or more health-based requirements of the law between 2016 and 2019; and direct EPA to formally revise or replace its outdated (1977) and inequitable policy guidance on water affordability, which is used by many utilities in rate-making and underestimates water affordability burdens for low-income people, who can be threatened with or subject to water shut-offs. The president should also urge Congress to pass comprehensive legislation and related appropriations for 1) accelerated remediation of non-compliant community water systems, prioritizing those serving vulnerable populations and including replacement of all lead pipes; 2) wastewater and stormwater infrastructure upgrades and expansion favoring green over gray infrastructure and prioritizing federal resources for the most vulnerable communities, starting in the Gulf South and the Atlantic coast.
- **Regulate or Stop Virtual Pipelines.** By Executive Order, direct the Department of Transportation to undertake a rulemaking to establish stringent, precautionary public safety rules for limiting expansion and reducing risks of surface transportation of fossil fuels, primarily crude oil by rail.
- **Regulate PFAS.** By Executive Order, require EPA rulemakings to establish comprehensive regulation of prevalent high-risk PFAS chemicals, including Maximum Contamination Levels under the Safe Drinking Water Act, and designation of PFAS as hazardous substances under the Superfund program and the Resource

Conservation and Recovery Act. The president should also urge Congress to amend SDWA to remove or revise regulatory review hurdles tailored for industry blockage of water safety regulation (established in 1996 SDWA amendments).

JUST RECOVERY

- **Equitable Disaster Recovery.** By Executive Order or Directive, direct the Department of Housing and Urban Development (HUD) to formally establish a consistent equity rubric in the Community Development Block Grant Disaster Recovery Program, which states must follow to demonstrate accurate assessment of unmet needs of low-income households and populations, and proportionate allocation of federal disaster aid for long-term housing recovery in response.
- **Equitable Resiliency.** Direct, if necessary through regulatory revision, the Federal Emergency Management Agency to establish clear standards and funding preferences for green infrastructure in the most vulnerable communities in its pre-disaster mitigation programs, especially the Building Resilient Infrastructure and Communities program (BRIC). Direct HUD to issue a formal policy guidance for CDBG-MIT funding, establishing a consistent rubric requiring State Action Plans to prioritize green infrastructure in the most vulnerable communities.

CLIMATE EQUITY ACCOUNTABILITY

- **Climate Equity Accountability and Enhanced Stakeholder Review.** By Executive Order, establish and institutionalize a Climate Equity Accountability System, based in the Office of Management and Budget, to require equity assessments of proposed climate and energy rules and programmatic investments; and by the same E.O., require that proposed rules and programmatic investments are subject to enhanced review and modification by frontline stakeholders.
- **Native Sovereignty for an Indigenous Just Transition.** By Executive Order or other directive, institutionalize strong federal standards and procedural requirements of federal agencies respecting self-determination and consent of tribal nations. Significant federal actions affecting tribal lands, livelihoods, and cultures should be held to a stringent decision-making standard of negotiated tribal consent.

- **Reform Regulatory Review.** By Executive Order (revoking E.O. 13771 and revoking or revising E.O. 12866), establish new regulatory review models to facilitate expansive, science-based regulation of air, water, and soil pollution and other environmental harms. New approaches should reform and limit applications of economic cost-benefit analysis as a primary tool of federal regulatory review, and should aim to capture the full benefits of regulation, including non-market benefits, and strictly prioritize non-economic public welfare goals of many federal statutes, as well as the need to reduce the cumulative impacts of multiple pollutants in environmental justice communities. More broadly, the president should set a new course for regulatory review by advocating for and advancing precautionary principles of federal action in the face of complex and potentially catastrophic crises such as climate change and ecosystem degradation.

ENERGY DEMOCRACY

- **Public and Community Power.** By Executive Order, establish and empower a Presidential Commission on Energy Democracy and Renewable Energy Futures. The commission will collaborate with frontline stakeholders to develop a national blueprint for public and community control of a clean, renewably-sourced, and more resilient energy system, including distributed energy generation as part of a broader transition to public and community control of the energy system. The national blueprint should also address and determine a specific federally funded plan for transitioning displaced fossil fuel workers into good-paying union jobs in a clean energy economy. The national blueprint should be actionable by budgetary and financial directives of the president, rulemakings, and future legislation; the president should also, by Executive Order, direct the Rural Utilities Service to undertake a rural cooperative coal-debt buyout or debt-forgiveness program, coupled with new financing or incentives to support clean, renewable energy transitions in the rural electricity system.

Initial Platform Signatories



350.org



Center for Biological Diversity



Climate Justice Alliance



Democracy Collaborative



GreenFaith



Greenpeace USA



Hip Hop Caucus



Indigenous Environmental Network



Institute for Policy Studies
Climate Policy Program



Maine People's Alliance



Michigan Environmental Justice Coalition



MoveOn



National LGBTQ Task Force



New Florida Majority



New Economy Coalition



Oil Change U.S.



People's Action



Sunrise Movement



Working Families Party

To view a complete and current list of platform signatories please [visit this webpage](#).



We are a dynamic “think-and-do” tank that powers the movement for a just, inclusive, multiracial democracy.

Through cutting-edge policy research, inspiring litigation and deep relationships with grassroots organizations, Dēmos champions solutions that will create a democracy and economy rooted in racial equity.

Our name means “the people.” It is the root word of democracy, and it reminds us that in America, the true source of our greatness is the diversity of our people.

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