

**Prince George's County Environmental
Justice Commission (HB 1362)
PG 421-19
MSAR# 12246**

Report of the Commission

January 10, 2020

Executive Summary

HB 1362, Chapter 352, Acts of Maryland 2019 re-established the 2018 Prince George's County Environmental Justice Commission ("Commission") with an effective date of June 1, 2019. HB 1362 requires the Commission to report its findings and recommendations on environmental justice issues with a plan of action to the Prince George's County House Delegation by December 31, 2019.

Open Commission meetings were held during the months of September through December 2019 at the Department of Environment's Largo office. Teleconference lines were also available for community input and Commission members. In the time allotted, the Commission identified priority areas, specific actions and a path forward. The priority areas are land use, health equity and environmental benefits districts. Specific actions include:

- Integrating environmental justice into land use decisions and permitting
- Mitigating cumulative adverse environmental impacts to air, land and water
- Requiring meaningful community engagement in permitting decisions
- Incorporating effective health impact assessments in the permitting process
- Establishing criteria for receipt of environmental benefits by communities adversely impacted by environmental and health stressors
- Targeting investments in environmental benefits districts

The path forward – the plan of action – is creation of a countywide Environment and Health Equity Functional Master Plan incorporating the listed actions. The Master Plan would be developed by the Maryland National Capital Park and Planning Commission at the direction of the Prince George's County Council.

Introduction

Chapter 779 of the Acts of Maryland 2018 established the Prince George’s County Environmental Justice Commission. The 2018 Commission issued a report in February 2019. Quoting Bunyan Bryant, a preeminent University of Michigan researcher, the 2018 Commission report provided the following definition of an environmental injustice:

An environmental injustice occurs when a particular social group, not necessarily a racially ethnic group, is burdened with environmental hazards. . . . It refers to those institutional rules, regulations and policies of the government or corporate decisions that deliberately target certain communities for least desirable land uses, resulting in the disproportionate exposure of toxic and hazardous waste on communities based upon prescribed biological characteristics.¹

For purposes of this report and the 2019 Commission’s work, a shorthand definition of an environmental justice community (“EJ community”) is a low-income minority community subject to a disproportionate impact from an environmental hazard or hazards.

House Bill 1362, Chapter 352, Acts of Maryland 2019, reestablished the Commission, altering the composition and charging it with reporting its findings and recommendations along with a plan of action to the General Assembly by December 31, 2019.

Composition of the Commission

HB 1362 maintained designations for the Prince George’s County Office of the County Executive, County Council, Department of the Environment, and Department of Permitting, Inspection and Enforcement in addition to representatives from an environmental organization and two County residents. It added representatives from the County State’s Attorney, the County Health Department, the Maryland Department of the Environment and one

¹ Bunyan Bryant, Environmental Justice (1995), p. 6

representative from the business community. In July 2019, the Honorable Michael Jackson, Chair of the Prince George's County House Delegation, appointed Joseph P. Gill, Director, Prince George's County Department of the Environment, as Chair of the Commission. The Department of the Environment assigned Akosua Dosu, Sustainability Coordinator, to serve as staff to the Commission. A complete list of Commission members and staff is found in Appendix A.

Commission Proceedings

The Commission held public meetings monthly from September through December 2019. During these four months, the Commission engaged in literature reviews, attended presentations from planning professionals, worked in topic specific work groups, and presented information at public forums to receive input on work priorities. The Commission posted the proceedings of its work on the Department of the Environment's website.²

The Commissioners first identified and reviewed national and county policies, projects and programs that address environment and social equity issues. Two resources were particularly helpful. The Program on Community Engagement, Environmental Justice and Health, School of Public Health, University of Maryland issued a report titled, *Environmental Justice Plan 2025* (CEEJH Plan 2025). The report provides a description of environmental justice issues specific to Prince George's County with recommendations on how to address the issues and metrics to measure improvement towards environmental equity. Another helpful resource was the New School's *Local Policies for Environmental Justice: A National Scan* (February 2019) ("National Scan"). This report provides a "comprehensive look at recent efforts in 23 cities, three counties and two utilities across the United States to address environmental injustices through innovative reforms of zoning, land use and other local policies" (National Scan, p.6). Additional resources consulted by the Commission are noted in the body of this report. A complete list of sources is found in Appendix B.

² <https://www.princegeorgescountymd.gov/3238/Environmental-Justice-Commission>

The Commission reviewed and supplemented the list of environmental justice priorities presented in the 2018 Commission report. Commissioners then selected their top three to five environmental justice priorities based on their own experiences with the issues and the capacity of the Commission to address them through development of recommendations and a plan of action. The priority issues were posted to the Commission's website and presented at three public forums – the DoE Green Summit, PGCPs Student Environmental Alliance Summit and DoE Environmental Action Council – to receive feedback and recommendations from residents.

After receiving public feedback, the Commission identified the top three priority areas to be:

- Land Use, Planning, Zoning and Development: Differential Permitting of Environmental Hazards and Locally Unwanted Land Uses (LULUs);
- Health Equity and Health Impact Assessments; and
- Environmental Benefits Districts.

The Commission resolved that the County's planning body should facilitate implementation of the recommended actions through the planning and zoning process. Specifically, the Maryland-National Capital Park and Planning Commission (M-NCPPC) should develop a countywide Environment and Health Equity Functional Master Plan addressing the priority environmental justice areas. The County Council would direct M-NCPPC to develop this Plan.

Functional Master Plan – A Statement of Need

A master plan is a jurisdiction's most dynamic tool to provide long-term guidance for policy, land use and socioeconomic conditions. The initiation of a functional master planning process will produce a guiding document that combines public input, data and analysis, and recommendations to address environmental justice issues. The Commission decided to focus on a plan instead of a policy after discovering that policies tend to lack research, resources and directions for proper implementation. California legislators recognized the importance of

including environmental justice in planning and introduced legislation to ensure it was incorporated in local jurisdiction planning documents. In 2016 California adopted, Senate Bill 1000, which “requires both cities and counties that have disadvantaged communities to incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies and objectives throughout the other elements.” (CEJA 2017)

The sections below discuss the Commission’s concerns in identified priority areas and recommend ways to address these concerns through development of an environment and health equity functional master plan.

Priority Areas

Land Use, Planning Zoning and Development: Differential Permitting of Environmental Hazards and Locally Unwanted Land Uses (LULUs)

An environmental concern nationwide and in Prince George’s County is the siting of hazardous and polluting industries on the fence line of residential communities. CEEJH Plan 2025 discusses examples in Bladensburg (concrete batching plant) and Brandywine (gas-fired power plants). Subregion 4 in Prince George’s County – an area bordered by US 50 to the north, Suitland Parkway to the south, and I-95/I-495 to the east is another example discussed further below.

The County’s 2018 Zoning Ordinance allows the Planning Board to place conditions on development which, theoretically, could include conditions to prevent, mitigate or offset the environmental impacts of hazardous and polluting industries to nearby residents. However, Section 27-3415 (b) in the County’s Zoning Ordinance update states that the conditions must be related to criteria in the ordinance: “Any conditions of approval shall be expressly set forth in the approval, shall be limited to conditions deemed necessary to ensure compliance with the requirements and particular standards of this Ordinance . . . When a Special Exception is

approved, any requirements for conditions deemed necessary to protect adjacent properties and the general neighborhood may be added.” There are no environmental justice criteria in the Ordinance.

Incorporate environmental justice into land use decisions and permitting

The Commission recommends development of an Environment and Health Equity Functional Master Plan implementing the following actions:

- (a) For purposes of land use and zoning reviews, establish criteria for identification of EJ communities. This can be done using national and local environmental inequity mapping technology and other relevant criteria identified by M-NCPPC in consultation with County agencies and local university partners.
- (b) Authorize the County Council, sitting as a District Council, to adopt special conditions as necessary for protection of environment and public health for development in EJ communities. Special conditions could be applied to permits for industries which produce hazardous materials or emissions within a certain distance of residential communities. A permit condition could also require such an industry to provide pre-development data on ambient air quality and other environmental conditions (soil contamination levels, contamination in nearby water bodies).
- (c) Issue formal guidance or a directive for enhanced reporting and inspection of industries which generate hazardous materials or emissions within a certain distance of residential zones. The National Environmental Justice Advisory Council developed a report that has guidance on how best to collect and disseminate data to ensure community members are informed about pollution burdens in their communities.³

³ www.epa.gov/sites/production/files/2018-01/documents/monitoring-final-10-6-17.pdf

In addition to local jurisdiction environmental justice planning requirements under California state law, Fulton County, Georgia is an example of a local jurisdiction that has incorporated environmental justice into the zoning process. See “Fulton County, GA—Environmental Site Analysis and Environmental Impact Reports (2004).”⁴

Mitigate Cumulative Environmental Hazards Impacting Air, Land and Water

The County must find ways to mitigate cumulative environmental hazards impacting air, land and water. Cumulative impacts are defined as: “The exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released.”⁵ Communities that are exposed to a combination of polluting industries and socioeconomic stressors likely suffer environmental and health inequities. Subregion 4 is an example of one such area:

⁴https://library.municode.com/ga/fulton_county/codes/code_of_ordinances?nodid=APXBZORE_ARTIVGEPR_4.18_ENADUS

⁵ *Cumulative Environmental Vulnerability and Environmental Justice in California’s San Joaquin Valley*, (Institute Journal of Environmental Research and Public Health, 2012).

Land Use, Planning AMD Zoning: Subregion 4 Case Study

Subregion 4 is bordered by US 50 to the north, Suitland Parkway to the south, and I-95/I-495 to the east. This subregion currently contains 35 percent of the county's industrially zoned land with eight established industrial areas. Residential neighborhoods in this subregion, mainly Cedar Heights, the Town of Cheverly, and the Town of Fairmount Heights continuously advocate for zoning mitigation efforts to address cumulative impacts of concentrated industrial operations.

The residents suffer from particulate matter emissions, diesel truck emissions, runoff into the water ways and traffic safety issues. Subregion 4 is predominately African American (88%). According to the EPA Environmental Justice Screen, the neighborhoods listed above are in the 90th percentile for particulate matter (PM 2.5), in the 95th percentile for diesel PM and in the 98th percentile for proximity to a risk management plan site (EPA, 2019). The Planning Department identified the need to mitigate the cumulative impacts by drafting a Subregion 4 Industrial Areas Action Plan.

New development that could further burden environmental justice communities should be either avoided or designed to mitigate adverse conditions. Planning guidance should be broadened to protect communities from disproportionate clustering of health and environmental hazards. According to M-NCPPC staff, the planning department does not have a mechanism for prohibiting saturation of specific or brands of uses during the development process. These uses include polluting industries. New York City's *Local Law 60 to Require Study of Environmental Justice Areas* (2017) is an example of one jurisdiction's work towards avoidance of new development which would contribute to adverse environmental conditions for overburdened communities.⁶

The Commission recommends development of an Environment and Health Equity Functional Master Plan implementing the following actions:

⁶ See <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=1805815&GUID=8901A89B-078E-4D47-88D8-EA3E48E715A1>

- (a) Measures for avoidance or mitigation of cumulative adverse impacts in EJ communities incorporated into detailed site plans and comprehensive/specific design plans.
- (b) Formal guidance on how to determine and assess cumulative adverse environmental impacts and socioeconomic health stressors.

Guidance for Meaningful Community Engagement

The County's 2018 Zoning Ordinance update requires pre-application site development meetings with impacted neighborhoods. However, section 27-3402 of the County Code states that the substance or results of the meeting are not binding: "Participation in any preliminary, pre-application neighborhood meeting is for informational purposes only. Any resultant participation and/or written summary of same shall not be part of the administrative record for any development application that may be filed and accepted."

In EJ communities, it is imperative that community feedback be informed and that affected citizens have proper mechanisms at their disposal to voice their concerns. There is a need for clear guidance on how community feedback in environmentally-impacted areas will be assessed and incorporated into the permitting process. Pennsylvania's Department of Environmental Protection *Environmental Justice Public Participation Policy* provides guidance on effective public engagement around environmental justice issues.⁷ A similar policy could be developed for Prince George's County through an Environment and Health Equity Functional Master Plan implementing the following actions:

- (a) Educating residents and communities on how best to use the planning process to recommend provisions that may be implemented as enforceable criteria in land use and permitting decisions.

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www.depgreenport.state.pa.us/elibrary/GetDocument?docId=7918&DocName=ENVIRONMENTAL%20JUSTICE%20PUBLIC%20PARTICIPATION%20POLICY.PDF%20

- (b) Issuing formal guidance for the Planning Board, Planning Examiner and permitting agencies on when and how to consider the feedback received from the pre-application process.

Health Equity and Health Impacts Assessments

Prince George’s County Code supports the examination of health impacts in decision making and requires the use of health impact assessments (HIA). HIAs are effective tools to assess the impact of land development proposals on vulnerable populations. However, the County Code requires the completion of HIAs within a short time frame: 30 days of receipt from M-NCPPC. Further, the Code stops short of requiring implementation of recommended actions.

M-NCPPC refers land development plans to the Health Department for assessment of conditions that may present adverse health impacts and conditions that may promote positive health outcomes in communities. The Health Department performs “desktop” HIAs annually using criteria including availability of healthy foods, noise, lighting, walkable connected communities, green open spaces, and clean air, and water. These criteria are not specifically listed in the Code and may not be the basis for binding conditions for development. Over the past seven years, HIAs have not resulted in substantial changes to development projects, despite the potential adverse health impacts on vulnerable communities.

Sec. 27-284. - Referral.

- Prior to acting on the Detailed Site Plan, the Planning Board shall . . . refer the plan to the Prince George's County Health Department. The Health Department shall perform a health impact assessment review of the proposed development identifying the potential effects on the health of the population, and the distribution of those effects within the population, including recommendations for design components to increase positive health outcomes and minimize adverse health outcomes on the community.

Capital Heights is one example of an area that would benefit from a health impact assessment prior to any future development:

Health Impacts Assessments: Capitol Heights Case Study

Prince George's County Health Department has established a Health Enterprise Zone (HEZ) for Capital Heights (zip code 20743) to redress health disparities for this underserved community. This HEZ focuses on bringing quality affordable healthcare to a community that is medically underserved, bears negative statistics relative to low birth weight and poverty, and has a diverse population with over 95% of residents belonging to racial and/or ethnic minorities. (*Prince George's County Health Enterprise Zone, Primary Care – Public Health Integrated Services Model*, November 15, 2012, Prince George's County Health Department.) The Capital Heights HEZ provides a model structure for establishing and sustaining data collection, management and analysis protocols and procedures which will inform long-term focus on health disparities.

Community involvement is essential to meaningful HIA but community input is missing from the County's assessment process due to the required 30 days turnaround for the review. Ideally, community involvement would occur prior to a developer applying for approval of a site plan or a design plan for a project in an EJ community. A pre-application community meeting is an effective means to inform the public about environmental health issues and solicit public participation in addressing such issues before formal project initiation.

To make HIAs an integral part of the decision-making process and to promote conditions that will protect health and reduce health inequities, recommended actions must be incorporated in detailed site plans and comprehensive/specific design plans. Also, communities must be involved in the assessment process. The County should codify criteria by which design plans for future and proposed development may be assessed for health impacts including land development activities in EJ communities. Development that impacts EJ communities should be required to follow the full health impact assessment process to include screening, scoping, assessing risks and benefits, developing recommendations, reporting and evaluating.

Incorporate effective health impact assessments in the permitting process

The Commission recommends development of an Environment and Health Equity Functional Master Plan implementing the following actions:

- (a) Codify criteria for a more robust HIA process for development projects. This guidance should include review criteria based on science, public and environmental health standards and community input.
- (b) Codify that the review process may take more than 30 days for some projects requiring community input. Require that community input be part of the HIA submitted to M-NCPPC for their staff reports.
- (c) Authorize the Planning Board to add conditions identified in HIAs to design plan approvals to protect public health.
- (d) Require pre-application community meetings to inform the public about environmental health issues and solicit public participation in addressing such issues.

Camden, New Jersey's Sustainability Ordinance⁸ and San Francisco, California's Health Code Article 38⁹ provide examples of work by local governments on effective use of health impact assessments.

Environmental Benefits Districts

With a County planning document that will set forth provisions to reduce environment and health burdens, there should also be provisions to increase environment and health benefits in communities of need. Environmental Benefits Districts (EBDs) provide an opportunity to benefit communities burdened by past environmental injustice. EBDs are "locations where the

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www.sustainablejersey.com/fileadmin/media/Grants_and_Resources/Small_Grants/Past_Grantees_Projects/Camden_City_2013_PSEG_20K_Sustainability_Ordinance.pdf.

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[http://library.amlegal.com/nxt/gateway.dll/California/health/article38enhancedventilationrequiredforu?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:sanfrancisco_ca\\$anc=JD_Article38](http://library.amlegal.com/nxt/gateway.dll/California/health/article38enhancedventilationrequiredforu?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$anc=JD_Article38)

State, EPA, and stakeholders can focus their resources to address the environmental concerns of . . . targeted communities” (US EPA, 2016). Environmental benefits such as increased tree canopy and parks can improve local air and water quality in addition to increasing property values. Benefits like community gardens and safe and affordable housing improve the health and mental well-being of residents.

The State of Maryland, EPA and the County have implemented programs to prioritize investments in areas that are most vulnerable to environmental hazards and depleted community well-being. MDE’s 2004 *Environmental Benefits Districts (EBDs)* designation of Central Prince George’s County is an example of how to integrate state environmental benefits districts into the County policy and planning practices.¹⁰ EPA’s “Collaborative Problem Solving Model” provides a seven-step process for stakeholders to assess, create and implement solutions that best meet the needs of the community.¹¹ For its part, the County has established Economic Enterprise Zones, a Health Enterprise Zone, and a Transforming Neighborhood Initiative. The Port Towns EcoDistrict discussed below is one example of an area for which environmental benefits could be provided through an EBD designation:

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file:///I:/SD/Research_Development_Section/Environmental%20Justice/PGC%20EJ%20Commission/2019%20EJ%20Commission/Action%20Plan/EBD%20combined.pdf

¹¹www.epa.gov/sites/production/files/2015_04/documents/ejproblemcollaborativesolvingmodel.pdf

Environmental Benefits Districts: Port Towns Case Study

Prince George's County Port Towns EcoDistrict was established to stimulate economic growth, promote green business, and implement environmental projects. Port Towns communities are vulnerable to environmental justice issues caused by cumulative environmental hazards and socioeconomic disparities.

Port Towns include the jurisdictions of Bladensburg, Colmar Manor, Cottage City and Edmonston. Port Towns communities are in close proximity to industrial clusters, freight rail transport and dense, heavy traffic. This area has a median household income of \$42,570, significantly less than the \$73,538 median household income for the County. (EcoDistricts, 2017) Bladensburg residents are primarily people of color with an 87% minority demographic. (EPA EJ Screen, 2019).

The EcoDistrict was established to encourage sustainable development and leverage resources for greater economic benefit for the communities. County agencies and Town decision makers collaborated to help businesses locate or grow in the EcoDistrict. Services include business consulting, workforce development and a series of tax incentives for eligible businesses. For the sustainability component, the EcoDistrict kick-off project was aimed at improving infrastructure to reduce stormwater flooding and industrial run off. The Port Towns EcoDistrict can be reestablished and expanded to provide environmental benefits for Prince George's County areas overburdened by environment and health stressors.

Develop criteria to designate Environmental Benefits Districts

There is a need for criteria to designate as EBDs communities that are overburdened by environmental and health hazards and to target such communities for investment. The Commission recommends development of an Environment and Health Equity Functional Master Plan implementing the following actions:

- (a) Establish guidance for creating EBDs based upon the MDE model and input from resident, organizational, government and environment/health leaders; and

- (b) Identify criteria and a threshold of environmental and health burdens that will trigger further consideration for a community to receive benefits or special permit considerations. An evaluation of baseline data of existing conditions should inform threshold values.

Target investment in Environmental Benefits Districts

The County should develop a plan to fund improvements in EBDs. The Commission recommends development of an Environment and Health Equity Functional Master Plan implementing the following actions:

- (a) Identify existing environmental funding streams and develop a process for determining a reasonable percentage of funding to be dedicated to environment and health benefits. Existing funding streams to be considered include:
 - i. State-grant funds distributed to Prince George's County. For example, in FY '17, the state provided \$2.7 million to Prince George's County for parks and recreational development. A portion of these funds could be designated for EBDs;
 - ii. Woodland conservation funds paid by developers to offset tree loss which could be used to plant trees in EBDs; and
 - iii. Highway user funds from proposed Prince George's County exit tolls which could be used for infrastructure improvements in EBDs.
- (b) Identify methods for implementing an environmental benefits surcharge on air, water, and solid waste disposal permits issued by the County. Funds from this surcharge could be used to underwrite investments in EBDs.

The Cities of Minneapolis and Baltimore offer guidance on how to use existing revenue streams and establish new ones to help fund environmental equity benefits. Minneapolis established a

Pollution Control Annual Registration Fee and prioritizes reinvestment of the fees into environmental justice communities within “Green Zones.”¹² In Baltimore, the City Council approved City Council Bill 18-0222, Charter Amendment – Equity Assistance Fund: “Authorizing the establishment of a continuing, non-lapsing Equity Assistance Fund, to be used exclusively to assist efforts that reduce inequity based on race, gender, or economic status in Baltimore [and] authorizing the Mayor and City Council to dedicate revenue to the Equity Assistance Fund by ordinance. . . .”¹³

Recommendations and Plan of Action

The Commission’s recommendations and plan of action to the Prince George’s County House Delegation (Delegation) is creation and adoption of a countywide Environment and Health Equity Functional Master Plan with steps taken by the following actors:

1. The County Council adopts a Resolution requiring the M-NCPPC to develop a Master Plan incorporating the priority areas and actions in this report
2. M-NCPPC develops the Master Plan in consultation with County agencies local university partners
3. The Council reviews and adopts the Master Plan. The Master Plan includes mechanisms for:
 - Integrating environmental justice into land use decisions and permitting
 - Mitigating cumulative adverse environmental impacts to air, land and water
 - Requiring meaningful community engagement in permitting decisions
 - Incorporating effective health impact assessments in the permitting process

¹²

https://library.municode.com/mn/minneapolis/codes/code_of_ordinances?nodeId=COOR_TIT3AIPDENPR_CH47E_NAIP0_47.40POCOANREPC.

¹³ <https://baltimore.legistar.com/LegislationDetail.aspx?ID=3479032&GUID=62CED207-15CB-4607-AB63-9670COA0366B&FullText=1>

- Establishing criteria for receipt of environmental benefits by communities adversely impacted by environmental and health stressors
 - Targeting investments in environmental benefits districts
4. The County Council, sitting as the District Council, implements the Master Plan in land use permitting decisions, in considering health impact assessments, in making approvals for investment in environmental benefits districts.

The Commission recommends that the Delegation consider requesting comments on this report from M-NCPPC and the County Council.

Finally, the Commission resolved that its members share this Report with constituent and stakeholder groups including the Health Equity Work Group, elected officials, community leaders and then to educate them on the opportunity to address environmental justice issues in Prince George's County through creation of Environment and Health Equity Functional Master Plan incorporating the priority areas and actions in this report.

Appendix A
Prince George's County Environmental Justice Commission Commissioners

Joseph P. Gill, Director, Prince George's County Department of the Environment, Chair of the Commission

Franklin Shelton, Chief of Special Prosecution Unit, Prince George's County State's Attorney Office

Gary Cunningham, Deputy Director, Prince George's County Department of Permitting, Inspection and Enforcement

The Honorable Calvin Hawkins, Council Member At-Large, Prince George's County Council

Devon Dodson, Special Assistant to the Secretary, Maryland Department of Environment

Evelyn Hoban, Associate Director, Division of Environmental Health/Disease Control, Prince George's County Health Department

David Harrington, President and CEO, Prince George's County Chamber of Commerce

Sacoby Wilson, PhD, MS, Director, Community Engagement, Environmental Justice and Health (CEEJH)

Dennis Borie, Prince George's County Resident; Regulatory Compliance Engineer, Air and Radiation Administration, Maryland Department of the Environment

Tiffany Ganthier, Prince George's County Resident; Institute Associate, Adaptation, Georgetown Climate Center

Staff

Akosua Dosu, Sustainability Coordinator, Prince George's County Department of the Environment

Appendix B

List of Resources

California Environmental Justice Alliance, Place Works. SB 1000 Implementation Toolkit: Planning for Healthy Communities. October 2017 https://healthyplacesindex.org/wp-content/uploads/2018/01/2017_sb1000_implementation_toolkit.pdf

City of Baltimore, Maryland. 2018. City Council Bill 18-0222, Charter Amendment – Equity Assistance Fund. August 14, 2018
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