

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 4

**REGION 4
ACTION PLAN TO INTEGRATE
ENVIRONMENTAL JUSTICE**

Region 4 Points of Contact for Environmental Justice:

Environmental Justice/Community Liaison Staff Office
Accountability Management Branch
Environmental Accountability Division

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Executive Summary

The U.S. Environmental Protection Agency (EPA), Region 4, is committed to ensuring that environmental justice (EJ) is incorporated into the Region's programs, practices, and policies. To that end, the *EPA Region 4 Action Plan to Integrate Environmental Justice* (Action Plan) was developed by the Environmental Justice/Community Liaison Staff Office (EJ/CL Staff Office), under the direction of the Regional Administrator's Office, and in conjunction with regional division and program offices, to outline specific goals, strategies, and activities for staff to use as a guideline when incorporating and implementing environmental justice activities in their respective areas. Further, this Action Plan is written in response to the goals outlined in the Administrator's April 9, 2001 Memorandum, entitled [*EPA's Commitment to Environmental Justice*](#). This plan has been completed in accordance with the guidance provided by the Office of Environmental Justice.

By incorporating environmental justice in all program areas, we will (1) adhere to the Agency's mission and Executive Order 12898, "[*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*](#)", to protect the health of all people and the environment, particularly low-income and minority communities; (2) identify environmental issues and recommend remedies that take into consideration the desires of the affected communities; and (3) build trust in the government. The EJ/CL Staff Office will coordinate the application of the Action Plan; receiving input and feedback from the regional environmental justice cross-divisional team, program management and staff, and the Region's Executive Management Team (EMT). The divisions will be jointly responsible for facilitating these goals and ensuring that the goals are met. We acknowledge parallel efforts by the EPA Assistant Administrators in their development of EJ action plans. We expect that national program action plans will provide greater clarity and direction on specific efforts to integrate environmental justice in Agency programs.

The Regional Environmental Justice Program, administered by the EJ/CL Staff Office, envisioned the Action Plan as an opportunity to outline specific goals for environmental justice from a regional perspective. This Action Plan is viewed as a living document and as such is subject to change. The activities outlined in this Plan are expected to take place during fiscal years 2003-04. Divisions will be required to provide annual EJ action plans to further detail implementation of the Action Plan. Division EJ action plans will include division-specific work, as well as cooperative tasks involving the EJ/CL Staff Office.

The first step in developing an action plan is to have clearly defined goals. In establishing goals, past history, challenges and activities must be considered. As well, current activities, needs, resources and accomplishments must be considered, along with future needs and challenges. After carefully considering all of the above, four overall goals for the Regional Environmental Justice Action Plan were established. The Environmental Justice Strategies and Activities Matrix ([*Attachment A*](#)) highlights goals, activities, timelines, and performance measures of the plan. We believe the Action Plan will provide consistency and collaboration as Region 4 continues to pursue its commitment to achieve environmental justice for all of its

communities. Further, the goals highlight our desire to integrate environmental justice into Agency programs, enhance public participation and access to information, and identify and respond to environmental justice matters. Additionally, this Action Plan emphasizes our intent to engage Region 4 States by working to increase their capacity to address environmental justice. We will educate EPA staff on environmental justice issues, and provide resources and direction to implement the Agency's strategic plans. The goals, and associated strategies and activities are inserted throughout the Action Plan to correspond with the framework set forth by the Office of Environmental Justice. The overall Regional goals and their corresponding strategies are listed below:

GOAL 1. Integrate Environmental Justice into Agency Programs

- Strategy 1. Senior manager leadership and fostering of environmental justice
- Strategy 2. Develop knowledge and skills of staff
- Strategy 3. Engage and collaborate across Divisions
- Strategy 4. Evaluate and report regional progress and results

GOAL 2. Enhance State Capacity to Address Environmental Justice

- Strategy 1. Provide opportunities to participate in EJ training, particularly train-the-trainer sessions
- Strategy 2. Collaborate with States on development of State EJ programs and/or policies
- Strategy 3. Raise awareness and build support

GOAL 3. Enhance Public Participation and Access to Information

- Strategy 1. Enhance public participation
- Strategy 2. Educate internal and external stakeholders on EJ
- Strategy 3. Manage the EJ Small Grants process

GOAL 4. Identify and Respond Appropriately to Environmental Justice Matters

- Strategy 1. Institute Region-wide complaint tracking process
- Strategy 2. Conduct analysis of data to determine areas of concern
- Strategy 3. Participate in collaborative problem-solving
- Strategy 4. Coordinate responses to high priority areas

Note: These are Regional goals. All Divisions and Offices will be responsible for ensuring that the goals are met.

**USEPA REGION 4
ACTION PLAN TO INTEGRATE ENVIRONMENTAL JUSTICE**

**ENVIRONMENTAL JUSTICE STRATEGIES AND
ACTIVITIES NARRATIVE**

I. INTRODUCTION

The U.S. Environmental Protection Agency (EPA), Region 4, has a firm commitment to the issue of environmental justice (EJ) and its integration into all programs, policies, and activities in the Region, consistent with existing environmental laws and their implementing regulations. This Action Plan establishes goals, strategies and activities that will further the integration of environmental justice into the Region's programs, practices, and policies. Effective implementation of the Region's Environmental Justice Action Plan means:

- Securing the commitment of senior management;
- Providing environmental justice guidance for all staff;
- Reviewing and integrating environmental justice priorities into Regional activities;
- Continuing and enhancing cross-divisional/cross-media interaction and approaches;
- Enhancing public participation and access to information;
- Enhancing Region 4 States' capacity to address environmental justice; and
- Identifying and responding appropriately to environmental justice matters.

This Action Plan captures EPA Region 4's continued commitment to achieving environmental justice by adopting specific goals, providing background and discussion, and adopting corresponding strategies and activities.

II. MANAGEMENT ACCOUNTABILITY

A. Regional Environmental Justice Policy:

Region 4 issued its [*Interim Policy on Identifying and Addressing Potential Environmental Justice Areas*](#) on April 22, 1999. It was signed by the Regional Administrator and distributed to EPA staff and Region 4 State Environmental Agencies. Since that time, the Interim Policy has been distributed to numerous external stakeholders, and has been used both internally and externally.

The purpose of the Policy is to provide clarification to Region 4 staff on applying EJ concepts in defining minority and low-income populations. The Policy outlines a process to help determine whether a case should be considered a potential EJ case, and if so, what course of action should be taken. It accomplishes this by explaining the tools to properly

define a potential EJ area of concern, setting forth a process to gather baseline information to conduct an EJ analysis, and identifying alternative actions which may lessen the impact on the affected community. It serves as a useful guide for all employees to make significant steps toward incorporating EJ into program activities, and to assist those who depend on EPA to protect human health and the environment.

Overall, the Policy was created to fulfill an immediate need to provide Region 4 staff with guidance to:

- clarify the concept of EJ through uses of terminology, definitions, and methodologies through the use of state-by-state thresholds;
- identify potential EJ areas of concern consistently;
- ensure greater public participation;
- answer EJ-related questions that are frequently asked; and
- provide a road map for all staff to integrate EJ into daily functions.

B. Regional Organizational Infrastructure:

The EJ/CL Staff Office is responsible for coordinating the implementation of Region 4's EJ activities and for the Region's outreach to EJ groups and stakeholders. The mission of the EJ/CL Staff Office is to raise awareness of EJ issues; identify, assess, and respond to inequitable impacts; focus resources on areas shouldering a disproportionate share of environmental harm; and communicate to the public about opportunities to get involved in environmental decision making.

Organizationally, the EJ/CL Staff Office is in the Environmental Accountability Division (EAD), the Accountability Management Branch (AMB). The mission of EAD is to 1) manage the Region 4 enforcement and compliance assurance program; 2) coordinate and integrate cross program functions, including environmental impact assessment and federal facility and tribal liaison; 3) lead the Region 4 environmental justice effort; and 4) provide legal advice and assistance to all Region 4 program and management divisions and offices. The Accountability Management Branch coordinates and integrates the enforcement and compliance assurance activities of the Region. The EJ/CL Staff Office is headed by a Program Manager who also serves as the Region's EJ Coordinator. Staff members of the EJ/CL Staff Office serve as liaisons to the divisions and the states. There is a regional EJ cross-divisional team, comprised of representatives from each of the divisions, that also serves as a mechanism to incorporate EJ into program areas.

The EJ/CL Staff Office develops a work plan which specifies the efforts of the Office and outlines goals, activities, and performance measures on an annual basis. The regional EJ cross-divisional team identifies performance challenges to work on to fulfill the mission of the team. To ensure that accountability for EJ is shared across the Region, each Division will develop a action plan that specifies the activities that will be taken to further goals identified in this Action Plan. Once developed, these plans will become appendices to the Regional EJ

Action Plan. Over the next two years, the Region will focus on ensuring that the Region’s senior level managers have a visible and leadership role in integrating EJ. This is a critical element for the many activities outlined in this document as well as those identified in division-specific action plans.

The box below highlights strategies and activities associated with management accountability under Goal 1: ‘Integrate Environmental Justice into Agency Programs’.

<p>Goal 1: Integrate Environmental Justice into Agency Programs</p> <p>Strategy 1: Senior manager leadership and fostering of environmental justice</p> <p>Activity 1a. Regional Administrator issue EJ Policy Statement</p> <p>Activity 1b. Regular EJ updates for Executive Management Team</p> <p>Activity 1c. Update regional guidance documents</p>

C. Operational Resources & Program Support:

The EJ/CL Staff Office has 5.5 full time equivalents (FTE) - Manager, 2 Environmental Scientists, Environmental Protection Specialist, Administrative Assistant, EJ Small Grants Manager (.5 FTE). The EJ/CL Staff Office Manager is responsible for directing or reviewing activities, policies, procedures, regulations, and programs related to leading the regional EJ program. In addition, each division has some level of FTEs dedicated to environmental justice with portions of additional staff time utilized when needed (i.e., Air, Pesticides, and Toxics Division, 0.3 FTE; Waste Management Division, 2.0 FTE; Water Management Division, 1.0 FTE). These FTEs are all drawn from existing program resources and directed towards addressing environmental justice concerns.

The regional EJ cross-divisional team is comprised of EPA employees from each Region 4 division. The team is responsible for assisting the EJ/CL Staff Office, each division, and their fellow employees in identifying and addressing EJ issues as needed and for serving as a liaison to their divisions. The team focuses on completing activities identified as performance challenges. Some of the divisions have divisional EJ teams to further dialogue on EJ across all of the divisions’ programs. One of the activities listed in Goal 1, strategy 2 is to rededicate the EJ cross-divisional team. This effort is essential for implementing activities mentioned in this Action Plan. A Region 4 organizational chart is attached to this Action Plan. ([Attachment B](#))

EJ has been a consistent funding priority in a number of regional efforts, including children’s health, regional geographic initiatives, outreach and education, compliance assistance, and many activities of the Waste Management Division, with particular emphasis on the Superfund Program. While the EJ/CL Staff Office does not receive specific contract funding for its activities, the Office does receive an allocation of resources to fund its EJ Small Grant recipients, and has a travel budget each year. Regional training funds support

the implementation of the EJ Fundamental Training. Additional EJ grants have been funded from resources obtained from the Waste Management Division. The Region will continue to pursue creative ways to support the needs of the Region's EJ Program, and to make the activities described in this Action Plan possible.

The box below highlights strategies and activities associated with regional priorities and the Agency's mission and EJ integration in specific programmatic areas under Goal 1: 'Integrate Environmental Justice into Agency Programs'.

<p>Goal 1: Integrate Environmental Justice into Agency Programs Strategy 3: Engage and collaborate across divisions Activity 3a. Rededicate charge of EJ cross divisional team Activity 3b. Pursue EJ cross-divisional team performance challenges to further regional goals Activity 3c. Provide outreach to staff on EJ issues Activity 3d. Raise resource and support issues to management</p>
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D. Government Performance and Results Act Alignment:

EPA is in the process of redesigning its Government Performance and Results Act (GPRA) goal structure. After the Agency completes this redesigning in September, 2003, we will undertake a concerted effort to align our Region 4 EJ goals and strategies with the Agency's GPRA goals. This will be accomplished via the Division/Office EJ action plans. Progress and accomplishments achieved by the Divisions will be monitored and evaluated by Regional management.

We will also utilize training under development by workgroups under the direction of the Office of Environmental Justice for Agency permitting staff. An area of emphasis for Region 4 is that of integrating EJ into permitting. In fiscal years 2003-04, the Region's EJ cross-divisional team will develop a guide and/or checklist on integrating EJ into permitting.

As previously stated, Divisions will develop program specific EJ action plans to support and fully implement this Action Plan. These plans will foster the integration of EJ into specific programmatic areas and functions. Ongoing efforts within the Region to address EJ concerns will serve as a starting point for developing effective program specific plans.

The box below highlights strategies and activities associated with the Region's operational infrastructure under Goal 1: 'Integrate Environmental Justice into Agency Programs'.

<p>Goal 1. Integrate environmental justice into agency programs Strategy 4: Evaluate and report regional progress and results Activity 4a. Develop Division EJ action plans Activity 4b. Evaluate and report progress and accomplishments of the Region Activity 4c. Evaluate EJ inquiry tracking system and process</p>

III. INTERNAL ORGANIZATIONAL ENGAGEMENT

The Regional EJ cross-divisional team serves as the mechanism to communicate with, receive input from, and otherwise consistently engage with program offices in the region. The regional EJ cross-divisional team serves as a liaison between the EJ/CL Staff Office and their respective divisions (Waste; Water; Air, Pesticides and Toxics; Environmental Accountability; and Science and Ecosystem Support). The Office of Policy and Management and the Office of Congressional and External Affairs also support regional EJ efforts. The team is the key mechanism whereby the EJ/CL Staff Office communicates with the programs. The EJ/CL Staff Office also works directly with program office staff on many EJ issues. The team meets monthly to discuss national policy issues as well as local/regional EJ issues and activities. Team members compile input from their divisions for regional and Headquarters reports. One of the activities listed in Goal 1, Strategy 2 is to rededicate and revitalize the EJ cross-divisional team. This effort is essential for implementing activities mentioned in this Action Plan. Building upon efforts initiated in fiscal year 2002, the Region will continue to provide training to regional staff as well as EJ stakeholders throughout the Region. By using training modules developed by the EJ Training Collaborative, we will be able to reach a large segment of regional EPA personnel to enhance their ability to integrate EJ into their work.

The box below highlights strategies and activities associated with internal organizational engagement under Goal 1: ‘Integrate Environmental Justice into Agency Programs’.

Goal #1: Integrate Environmental Justice into Agency Programs
Strategy 2. Develop knowledge and skills of staff
Activity 2a. Develop implementation plan and conduct EJ staff training
Activity 2b. Conduct EJ train-the-trainer forum
Activity 2c. Promote training that complements the EJ training (e.g., Community Involvement)

Collaboration across programs can help resolve EJ concerns/matters. Team members serve in a coordinating capacity to ensure that appropriate staff are identified to resolve the concern and/or assist in the resolution if they are the responsible staff person. Further, individuals in the divisions dedicated full-time to addressing environmental justice often coordinate cross-divisional efforts to address specific environmental justice concerns.

The *Interim Policy to Identify and Address Potential Environmental Justice Areas* addresses the integration of EJ in most programmatic areas. It will be revised in the near future. The [*Draft Environmental Justice Protocol*](#) was developed in May 1997 to develop criteria to address and incorporate EJ into the Agency’s operating procedures. An enforcement guide has been developed by the EAD workgroup and the regional EJ cross-divisional team is developing a guide on EJ and permitting.

The box below highlights strategies and activities associated with EJ guidance to staff and

regional engagement to respond to EJ concerns under Goal 1: ‘Integrate Environmental Justice into Agency Programs’ and Goal 4: ‘Identify and Respond Appropriately to Environmental Justice Matters’.

Goal #1: Integrate environmental justice into agency programs

Strategy 1: Senior management leadership and fostering of environmental justice

Activity 1c: Update regional guidance documents

Goal #4: Identify and respond appropriately to environmental justice matters

Strategy 4: Coordinate response to high priority areas

Activity 4a: Conduct work in specific geographic areas in response to EJ concerns

Activity 4b: Coordinate regional response to EJ communities

IV. EXTERNAL STAKEHOLDER ENGAGEMENT

EPA Region 4 has historically engaged external stakeholders in an effort to receive input and improve our efforts to address environmental justice issues and concerns. The region has actively participated in [National Environmental Justice Advisory Council](#) Meetings, and has planned and conducted a number of environmental justice summits and workshops. Our engagement ranges from senior management to front line staff that frequently interact with external stakeholders.

Region 4 has actively participated in the development and planned implementation of the Agency’s Public Involvement Policy, and its focus toward addressing public participation needs of low-income and minority populations. Additionally, subsequent memoranda from EPA’s Administrator Whitman, *EPA’s Regulatory Decision Process*, dated April 10, 2001 and the Office of Emergency and Remedial Response’s Acting Office Director, [Early and Meaningful Community Involvement](#) (PDF 329KB), dated October 12, 2001, endorse “vigorous public outreach” in working toward environmental goals.

EPA Region 4 embraces the Agency’s definition of environmental justice:

“Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including a racial, ethnic, or a socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Meaningful involvement means that: (1) potentially affected community residents have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; (2) the public's contribution can influence the regulatory agency's decision; (3) the concerns of all participants involved will be considered in the decision making process; and (4) the decision makers seek out and facilitate the involvement of those potentially affected.”

To that end, a key tenet of Region 4's EJ program is meaningful involvement of low-income and minority constituents in the Agency's decision making processes. There are a number of ways we pursue this objective:

- Program Specific Public Involvement Activities
- EJ listening sessions
- Direct contact
- Site visits
- Hotline numbers and web pages
- EJ newsletter
- Conference and workshops
- EJ Small Grants Program
- EJ Tracking Inquiry Program

EJ communities, state and local governments, academic institutions, and industry are examples of external stakeholders that maintain involvement and input through the above processes. Through data collected from the EJ inquiry program, targeting efforts, and other approaches we can determine those communities who could benefit from increased awareness and participation in collaborative problem-solving activities.

In the past, the EJ/CL Staff Office, in conjunction with the Divisions, has initiated several collaborative efforts involving communities and groups or organizations who could assist the community as a result of complaints raised from the community. In those instances, the EJ/CL Staff Office acts as a liaison between the two entities to ensure that each stakeholder group's concerns are addressed. Mediation and alternative dispute resolution resources are frequently used by the Region in an effort to resolve disputes involving EJ communities.

The Region has initiated outreach to non-English speaking stakeholders in the Region. In 2002, the EJ/CL Staff Office initiated a Hispanic Outreach Initiative. The EJ/CL Staff Office collaborated with the Region 4 Hispanic Employment Council to develop strategies to increase environmental awareness in Hispanic communities in the Region. Outreach activities included direct contact and distribution of EPA publications printed in Spanish, including the EJ Small Grants application guidance and a number of children's health-related publications.

The box below highlights strategies and activities associated with external stakeholder engagement under Goal 3: ‘Enhance Public Participation and Access to Information’.

<p>Goal #3: Enhance Public Participation and Access to Information</p> <p>Strategy 1. Enhance public participation</p> <ul style="list-style-type: none">Activity 1a: Hold public meetings based on Public Participation GuidanceActivity 1b: Ensure public comment periods are communicated to communities potentially impactedActivity 1c: Make EPA documents/reports available to EJ communitiesActivity 1d: Facilitate technical assistance/outreach opportunities <p>Strategy 2. Educate internal and external stakeholders on EJ</p> <ul style="list-style-type: none">Activity 2a: Conduct EJ Listening Sessions for EJ communitiesActivity 2b: Continue outreach programsActivity 2c: Participate in and/or conduct workshops, conferences, or community meetingsActivity 2d: Provide information via various means (i.e., website, newsletter, toll free phone line) <p>Strategy 3: Manage the EJ Small Grants process</p> <ul style="list-style-type: none">Activity 3a. Provide training for new granteesActivity 3b. Participate in development of EJ Small Grants GuidanceActivity 3c. Conduct site visits and monitor grants

State governments responsible for implementing state environmental programs play an integral role in monitoring and enhancing environmental justice in low-income and minority communities. EPA will continue to assist States in their efforts to address EJ by providing EJ training and developmental opportunities (e.g., state strategic plans, EPA/EJ meetings, State/EPA meetings).

The box below highlights strategies and activities associated with external stakeholder engagement, specifically Region 4 state environmental programs under Goal 2: ‘Enhance State capacity to address environmental justice’.

<p>Goal #2: Enhance State Capacity to Address Environmental Justice</p> <p>Strategy 1: Provide opportunities to participate in EJ training, particularly train-the-trainer sessions</p> <ul style="list-style-type: none">Activity 1a. Develop an implementation plan for EJ trainingActivity 1b. Invite state EJ coordinators to R4 training <p>Strategy 2: Collaborate with states on development of state EJ programs and/or policies</p> <ul style="list-style-type: none">Activity 2a. Conduct annual EPA/State meetingActivity 2b. Conduct regular conference callsActivity 2c. Collaborate with States in their development of State EJ strategic plan <p>Strategy 3. Raise awareness and build support</p> <ul style="list-style-type: none">Activity 3a. Place EJ on agenda for State EPA meetingsActivity 3b. Recognize states for EJ efforts
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V. DATA COLLECTION, MANAGEMENT, AND EVALUATION

Region 4 is currently converting base potential EJ geographic information system (GIS) data layers to 2000 Census data. This GIS demographic data forms the basis for analysis that is done relative to enforcement, National Environmental Policy Act (NEPA) EJ reviews, EJ Small Grants Program grant application reviews, and site-specific work within the divisions. In addition, the EJ/CL Staff Office requests monthly highlights from each of the divisions. This information is used to compile information, when requested, for Headquarters reports and Region 4 management. The EJ inquiry program will help to ensure that inquiries/complaints received from external stakeholders are responded to and managed in a consistent and timely manner. The regional EJ inquiry program will allow EPA staff to input pertinent data regarding inquiries into a database, ensure cradle-to-grave routing, and minimize misuse of resources. The EJ inquiry program will have an evaluation component to provide useful information for targeting and monitoring purposes. Automated information regarding numbers of and response time to EJ inquiries and complaints should be available in FY 2003. The Region is acquiring web-based software that will be used to track inquiries.

The Region is fulfilling the requirement to monitor its grants after award; this will involve on-site and desktop reviews and increased interaction with grantees. In the case of EJ Small Grants, greater emphasis is being placed on providing Agency technical assistance in order to effectively address the EJ issues of concern. Region 4 highlights success stories of the EJ Small Grants program via Region 4's website, as well as in a written report.

The box below highlights strategies and activities associated with data collection, management and evaluation under Goal 4: 'Identify and respond appropriately to environmental justice matters'.

Goal 4: Identify and respond appropriately to environmental justice matters

Strategy 1. Institute Region-wide complaint tracking process

Activity 1a. Conduct training on inquiry tracking system

Activity 1b. Conduct pilot

Activity 1c. Expand system region-wide

Strategy 2. Conduct analysis of data to determine areas of concern

Activity 2a. Compile & overlay appropriate data layers

Activity 2b. Prepare report on findings for use by staff

Strategy 3. Participate in collaborative problem-solving

Activity 3a. Support and participate in regional Federal Interagency Working Group projects

Activity 3b. Utilize Alternative Dispute Resolution (ADR) as appropriate

Strategy 4. Coordinate response to high priority areas

Activity 4a. Conduct work in specific geographic areas in response to EJ concerns

Activity 4b. Coordinate regional response to EJ communities

VI. PROFESSIONAL AND ORGANIZATIONAL DEVELOPMENT

The EJ/CL Staff Office will coordinate providing EJ training to Region 4 staff and external stakeholders. It is helpful when EPA staff are exposed to EJ in a training environment that is inclusive of all stakeholder groups. The exchange of dialogue from various perspectives enhances the learning experience. The EJ/CL Staff Office, in collaboration with the Office of Human Resources, the Training Coordinators within the Divisions, and EJ and public affairs-related staff, will work together to promote training opportunities that complement the EJ Fundamentals Workshops. Training will be offered several ways to obtain maximum participation (e.g., half-day and two-day training, brown bag sessions and hands-on training).

Pre-existing training related to community involvement and public participation (such as the Community Involvement University developed by the Office of Emergency and Remedial Response and co-sponsored in the Region by the Waste Management Division and the Regional Training Institute) will be promoted more widely throughout the Region. The Community Involvement University (CIU) helps develop the community involvement skills of Regional response staff, as well as provide continuing education for Community Involvement Coordinators (CICs) at all levels of experience. The CIU builds capacity in the Agency by offering classes not only to CICs, but also to Regional Managers and Staff, Regional Attorneys, and other federal partners, if space allows. The Regional Training Institute and the Office of Public Affairs routinely offer training opportunities that build skills helpful in addressing EJ.

The box below highlights strategies and activities associated with professional and organizational development under Goal 1: ‘Integrate Environmental Justice into Agency Programs’.

Goal #1: Integrate Environmental Justice into Agency Programs
Strategy 2. Develop knowledge and skills of staff
Activity 2a. Develop implementation plan and conduct EJ staff training
Activity 2b. Conduct EJ train-the-trainer forum
Activity 2c. Promote training that complements the EJ training (e.g., Community Involvement, etc.)

In addition, EJ/CL staff are encouraged to participate in technical and organizational training classes offered by the Region to ensure that their knowledge and skills are kept up to date. This not only enhances their personal, professional growth, but also ensures that they maintain high credibility when dealing with the public. The EJ/CL Staff Office and the cross divisional EJ team conduct periodic retreats, as well as participate in other events geared towards professional and organizational development.

VII. ENVIRONMENTAL JUSTICE ASSESSMENT

The [Region 4 Interim Policy to Identify and Address Potential Environmental Justice Areas](#)

establishes a process for Regional staff to use in conducting EJ assessments. The term “EJ assessment” describes the way the Region defines its potential EJ areas. An abbreviated version of the EJ assessment process is outlined in the *EJ Pocket Guide*. Upon finalization of the Office of Environmental Justice EJ Toolkit, the Region will revise the Interim Policy to enhance current assessment protocols, as appropriate.

The box below highlights strategies and activities under Goal 1: ‘Integrate Environmental Justice into Agency Programs’ and Goal 4: ‘Identify and Respond Appropriately to EJ Matters’.

Goal 1: Integrate environmental justice into agency programs Strategy 1: Senior management leadership and fostering of environmental justice Activity 1c. Update regional guidance documents
Goal 4: Identify and respond appropriately to environmental justice matters Strategy 2: Conduct analysis of data to determine areas of concern Activity 2a. Compile and overlay appropriate data layers Activity 2b. Evaluate trends from regional databases

VIII. PROGRAM EVALUATION

The Region evaluates its environmental justice efforts in a number of ways. The EJ/CL Staff Office submits specific goals, activities, and performance measures in the Accountability Management Branch’s annual work plan. An accomplishment report is generated annually based on the previous year’s work plan. For the EJ/CL Staff Office, activities and milestones are reviewed 2-3 times per year to assess progress and results of activities laid out in the EJ/CL work plan. This information is reported to the Region’s senior management. The cross-divisional EJ team is charged with evaluating outcomes of its efforts to address specific performance challenges. The team can make further recommendations to regional management about resources needed to strengthen or improve the Region’s environmental justice program.

The EJ/CL Staff Office, in concert with the EJ cross-divisional team and regional management, will develop additional mechanisms to be used to evaluate the Region’s environmental justice efforts. Evaluation results will be shared with senior management. Division EJ action plans will be reviewed on a periodic basis. An annual report will be generated on the progress of the Action Plan and shared with the EMT and the cross-divisional EJ team.

Further, incorporated in the EJ inquiry program pilot is an evaluation of the pilot. The evaluation would be conducted by upper-level EPA staff not associated with the EJ inquiry program pilot. The evaluation team would be tasked with recommending to senior management the future expansion of the EJ inquiry program.

Results and accomplishments from EJ activities will be highlighted in a number of ways. Articles will be published for the Region’s employee newsletter, EJ newsletter and on the [Region’s webpage](#). The Region will continue to recognize employees’ efforts through the

Agency's awards program.

The box below highlights strategies and activities related to program evaluation under Goal 1: 'Integrate Environmental Justice into Agency Programs'.

Goal 1. Integrate Environmental Justice into Agency Programs

Strategy 4: Evaluate and report regional progress and results

Activity 4a. Develop Division/Office EJ action plans

Activity 4b. Evaluate and report progress and accomplishments of the Region

Activity 4c. Evaluate EJ inquiry tracking system and process

IX. CONCLUSION

In conclusion, this Environmental Justice Action Plan will be a living document. The USEPA Region 4 management and staff are dedicated to achieving environmental justice for low-income and minority residents in communities located within the eight southeastern states. We believe that the goals, strategies and activities outlined in this Action Plan are achievable, and will result in fair treatment and meaningful involvement for all citizens served by the Region 4 Office of the U. S. Environmental Protection Agency. We welcome feedback on the strategies proposed in this Action Plan.

ATTACHMENT A: ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES MATRIX

The strategies described here are reflective of all of the Divisions and Offices in EPA Region 4, not any one office or entity. The Environmental Justice and Community Liaison (EJ/CL) Staff Office is listed as the lead contact only for purposes of reporting progress and accomplishments under this Action Plan. Additional detail for activities of each division will be set forth in Division EJ Action Plans.

GOAL #1: Integrate Environmental Justice into Agency Programs

STRATEGIES	ACTIVITIES	DURATION/ DUE DATE	PERFORMANCE MEASURES
1. Senior manager leadership and fostering of environmental justice	1a. Regional Administrator issue EJ Policy Statement 1b. Regular EJ updates for Executive Management Team 1c. Update regional guidance documents	1a. 2 nd qtr '03 1b. Biannually 1c. 4 th qtr '04	1a. Statement issued 1b. Increased knowledge/support of EJ activities 1c. Updated document distributed to all staff
2. Develop knowledge and skills of staff	2a. Develop implementation plan and conduct EJ staff training 2b. Conduct EJ train-the-trainer forum 2c. Promote training that complements the EJ training (e.g., Community Involvement)	2a. 1 st qtr '03 2b. 2 nd qtr '03 2c. Ongoing	2a. Increased knowledge of participants 2b. Variety of staff and stakeholders trained 2c. Courses identified and promoted to Region 4 staff
3. Engage and collaborate across divisions	3a. Rededicate charge of EJ cross divisional team 3b. Pursue team performance challenges to further regional goals 3c. Provide outreach to staff on EJ issues 3d. Raise resource & support issues to management	3a. 1 st qtr '03 3b. Ongoing 3c. Ongoing 3d. Ongoing	3a. All divisions with active representation on team 3b. Performance challenges completed timely 3c. Systematic mechanism in place and utilized to communicate with staff
4. Evaluate and report regional progress and results	4a. Develop Division/Office EJ action plans 4b. Evaluate and report progress and accomplishments of the Region 4c. Evaluate EJ inquiry tracking system and process	4a. 2 nd qtr '03 and annually 4b. 1 st qtr '04 and annually 4c. 4 th qtr '03	4a. All divisions/Offices with plans 4b. Activities identified completed; increased evidence of EJ being integrated into the work of the Region 4c. Needed modifications identified and implemented

ATTACHMENT A: ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES MATRIX

Goal #2: Enhance State Capacity to Address Environmental Justice

STRATEGIES	ACTIVITIES	DURATION/ DUE DATE	PERFORMANCE MEASURES
1. Provide opportunities to participate in EJ training, particularly train-the-trainer sessions	1a. Develop an implementation plan for EJ training 1b. Invite state EJ coordinators to R4 training	1a. 2 nd Qtr '03 1b. 1 st Qtr '03	1a. Conduct EJ training for EPA staff and external stakeholders 1b. All State EJ Coordinators from R4 participate
2. Collaborate with states on development of state EJ programs and/or policies	2a. Conduct annual EPA/State meeting 2b. Conduct regular conference calls 2c. Collaborate with States in their development of a State EJ strategic plans	2a. 4 th Qtr '03 2b. Ongoing 2c. End of '04	2a. Conduct one meeting per year 2b. Conduct one call per month 2c. Each State EJ program develop a plan
3. Raise awareness and build support	3a. Place EJ on agenda for State EPA meetings 3b. Recognize states for EJ efforts	3a. Ongoing 3b. End of '04	3a. Include EJ in at least 4 of R4 State mtgs. 3b. Develop consistent guidelines

ATTACHMENT A: ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES MATRIX

GOAL #3: Enhance Public Participation and Access to Information

STRATEGIES	ACTIVITIES	DURATION/ DUE DATE	PERFORMANCE MEASURES
1. Enhance public participation	1a. Hold public meetings based on Public Participation Guidance 1b. Ensure public comment periods are communicated to communities potentially impacted 1c. Make EPA documents/reports available to EJ communities 1d. Facilitate technical assistance/outreach opportunities	1a. Ongoing 1b. Ongoing 1c. Ongoing 1d. Ongoing	1a,b,c, d. No EPA action is conducted in an area without providing appropriate opportunity for community engagement or availability of information
2. Educate internal and external stakeholders on EJ	2a. Conduct EJ Listening Sessions for EJ communities 2b. Continue outreach programs 2c. Participate in and/or conduct workshops, conferences, or community meetings 2d. Provide information via various means (i.e., website, newsletter, toll free phone line)	2a. '03 and '04 2b. Ongoing 2c. Ongoing 2d. Ongoing	2a. Listening sessions completed; action plans established when needed to follow-up on issues raised 2b. Hispanic communities identified and materials/communication accomplished 2c. # workshops/conferences conducted; # participants reached
3. Manage the EJ Small Grants process	3a. Provide training for new grantees 3b. Participate in development of EJ Small Grants guidance 3c. Conduct site visits and monitor grants	3a. 1 st qtr '03 3b. 1 st qtr '03 3c. 3 rd / 4 th qtr annually	3a. 90% of new grantees attend training 3c. 75% of grant projects visited

ATTACHMENT A: ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES MATRIX

Goal #4: Identify and Respond Appropriately to Environmental Justice Matters

STRATEGIES	ACTIVITIES	DURATION/ DUE DATE	PERFORMANCE MEASURES
1. Institute Region-wide complaint tracking process	1a. Conduct training on inquiry tracking system 1b. Conduct pilot 1c. Expand system region-wide	1a. 2 nd Qtr '03 1b. 2 nd Qtr '03 1c. 4 th Qtr '03	1a. # of trained EJ Inquiry Coordinators 1b. Complete pilot by end of 2 nd Qtr 1c. Institute region-wide in FY04
2. Conduct analysis of data to determine areas of concern	2a. Compile & overlay appropriate data layers 2b. Prepare report on findings for use by staff	2a. End of '03 2b. 1 st Qtr '04	2a. Determine concentration of EJ areas of concern
3. Participate in collaborative problem-solving	3a. Support and participate in regional Federal Interagency Working Group projects 3b. Utilize Alternate Dispute Resolution, as appropriate	3a. Ongoing 3b. Ongoing	3a. Assist IWG projects in efforts
4. Coordinate response to high priority areas	4a. Conduct work in specific geographic areas in response to EJ concerns 4b. Coordinate regional response to EJ communities	4a. Ongoing 4b. Ongoing	4a. Coordinated agency responses

Attachment B: Organizational Chart

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