

# REGION 7 EJ WORK PLAN FY 2004-2005

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## **I. INTRODUCTION:**

The goal of the Region 7 Environmental Justice Program is Environmental Justice for all populations regardless of race, color, national origin, or income.

Environmental Justice is defined as the fair treatment of people of all races, cultures, and income levels with respect to the development, implementation, and enforcement of environmental laws and policies, and their meaningful involvement in the decision-making processes of the government.

The primary focus of the Region 7 Environmental Justice Program is to ensure that as a Region we are fulfilling the mandate given in Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, in a manner which is consistent with Governor Christine Todd Whitman's August 9, 2001 memorandum. Fulfilling this mandate will mean continued efforts to both ensure that the Region is addressing environmental justice in all we do and ensuring community awareness regarding environmental issues and the decision-making processes. The program will maintain outreach and education activities through grant programs and Agency participation in community activities in a manner which produces tangible environmental benefits for low-income and minority communities.

*Executive Order 12898: "...To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal Agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations..."*

In order to achieve the goal of ensuring environmental justice for all populations the region has outlined the following objectives:

- 1. Internal Implementation:** Region 7 will continue to work toward integration of environmental justice in our work processes and procedures. This work will entail provision of training and implementation tools such as the regional EJ policy and Geographic Information Systems (GIS), as well as commit to activities which ensure EJ is addressed.
- 2. Program Coord./Communication & Education:** The EJ Program will continue to work on enhancing its communication and coordination efforts with internal staff as well as with external stakeholders. Tools for effective program

coordination/communication and education will be the EJ Web page, EJ Updates, the Regional EJ Annual report, and the Environmental Justice Implementation Team.

3. **Public Outreach and Education:** Public outreach and education will be focused on specific environmental and health-related concerns relevant to a particular population. EJ outreach and education will include providing EJ awareness information to potentially impacted communities, the regulated community, academia, and local municipalities.
4. **Coordination with States and Tribes:** Region 7 will continue to seek opportunities to gain commitments from state programs to ensure integration of environmental justice. These opportunities may be State Director's meetings, input on state grants, EJ training, and providing technical support at state-regulated EJ sites.
5. **Coordination with Federal Agencies:** The EJ program will continue to seek opportunities to work with other federal agencies in the mission of ensuring environmental justice. We will continue to coordinate with other federal agencies to address EJ issues and invite them to participate in Regional education and outreach activities.
6. **EJ Liaison to HQ and other Stakeholders:** The EJ liaison role will include EJ complaint follow-up, coordination, and communication with EPA Headquarters and other stakeholders.

**Guiding Principles:** Region 7 has identified the following guiding principles which serve as the thread to the fabric of satisfying each of the six objectives outlined above to ultimately reach the goal of ensuring environmental justice for all:

- *Tangible Environmental/Health benefits*
- *Measurable Outcomes*
- *Effective Teamwork*
- *Up-front Planning*
- *Timely Executed and Quality Work*
- *Communication with all stakeholders*
- *Marketing to realize maximum benefit*
- *Internal Education*
- *Problem Resolution*
- *Internal Communication*
- *Inclusion of staff outside EJ Program in EJ activities*

## **II. MANAGEMENT ACCOUNTABILITY**

### **A. Regional Environmental Justice Policy**

The Region 7 Interim EJ Policy provides Region 7 staff with a document that establishes a platform on which to base the implementation of environmental justice to achieve measurable outcomes that demonstrate fair treatment and meaningful public involvement of affected communities.

The policy is applicable Region-wide, regardless of program area or function. The responsibility of all EPA staff is to ensure fair treatment of people regardless of race, culture, income or any other factors which could result in greater vulnerability to environmental pollution, with respect to the development, implementation, and enforcement of environmental laws and policies and their meaningful involvement in decision-making processes. The Interim Policy has been organized along functional lines and is intended to cross media and programmatic divisions. (See Appendix A)

EPA Administrator, Christine Todd Whitman's August 9, 2001, memorandum broadly defines the goal of environmental justice and the actions the Agency will take to ensure that this goal is obtained. This policy was created in response to the request from EPA Region 7 staff to have guidance that interprets the Agency's broad commitment to environmental justice into specific steps which might be taken to fulfill this commitment, given our existing programs, policies, and procedures. The Interim EJ policy is the first step toward providing staff information to support integration of EJ into our day-to-day work.

The next step in integrating environmental justice into work policies, processes, and procedures is developing standard operating procedures (SOP's) for EJ cases as well as each functional area within the region. Strategies to complete this task in FY'03 include:

- ☐ Staff SOP training,
- ☐ Development of EJ Complaint Process, and
- ☐ Development of EJ SOP for Enforcement [Objective 1. Internal Implementation]

### **B. Organizational Structure**

The Region 7 Environmental Justice Program is located in the Enforcement Coordination Office which is attached to the Regional Administrator's office. The organizational proximity of the EJ program to the RA's office enables EJ to be consistently highlighted as a regional priority important in all program areas. (See Appendix B)

The location of the EJ program in an office which has coordination responsibilities for enforcement provides the program with an opportunity to be involved in the planning and

prioritization areas for all regional enforcement programs. This connection has allowed the regional enforcement programs to accelerate the integration of EJ principles into their work. The integration of EJ principles into enforcement activities cross media can be seen in the use of EJ as a targeting criterion for all enforcement programs through the Regional Targeting Team. (See Appendix C)

**C. *Communication of Management Expectations***

Regional management will continuously communicate expectations having to do with the integration of EJ into work processes and procedures. Among the ways of communicating management expectations regarding EJ are:

- Reviewing the Interim Regional Environmental Justice Policy with all regional staff and reiterated on an on-going basis as a regional priority.
- Incorporating Environmental Justice into the regional orientation process for new staff through training in order to highlight the importance of EJ principles as well as further integration into work processes cross media.
- Integrating EJ into all program areas and regional priorities. Examples of this include 1) the “*Informing People on Pesticides*” project associated with the Agriculture Initiative; 2) the Lincoln University EJ Resource Center associated with the joint Memorandum of Understanding (MOU) with Missouri Department of Natural Resources and Lincoln University; and 3) the on-going coordination of numerous EJ grant programs with the Sensitive Populations’ Initiative.

**D. *Operational Resources/Program Support***

**1. *Full-time Equivalent in Region 7 currently specifically focused on EJ***

Total No. - 4.75 FTE

- 1 FTE - EJ Coordinator
- 1 FTE - EJ Grants/EJ Training
- 1 FTE - EJ Grants/EJ Training
- 1 FTE - EJ Specialist
- .5 FTE - Regional Counsel
- .25 FTE - Public Affairs Specialist

In addition to those full time staff whose responsibilities are primarily focused on EJ, numerous staff are also engaged in environmental justice work through the integration of environmental justice into their everyday work.

**2. *Functions and Responsibilities of EJ Staff***

Functions of the EJ Staff include the following:

- Internal Implementation
- Program Coordination/Communication/Education
- Public Outreach and Education
- Coordination with States and Tribes
- Coordination with Other Federal Agencies
- EJ Liaison to HQ and other Stakeholders

3. ***Regional Mechanisms for Focusing on EJ***

The Environmental Justice Implementation Team (EJIT) is a Regional workgroup which consists of representatives from each division as well as ad hoc membership by program managers of each Regional multi-media initiatives. The purpose of the team is to plan, coordinate, and guide Regional environmental justice implementation efforts as well as to ensure that implementation planning, activities, and results include perspectives from all regional functions. The goal of the EJIT is to ensure that there is environmental justice in all EPA operations within the four state region. [See Appendix D]

4. **Special Program Initiatives which list EJ as a Funding Priority**

**A. Lincoln University Environmental Justice Resource Center** - Under the auspicious of EPA's Memorandum of Understanding (MOU) with Lincoln University (LU), Jefferson City, MO, LU has been awarded \$50,000 funding for a grant project to provide technical assistance in the area of compliance assistance and other environmental issues to communities located in low-income /minority areas of the Bootheel of Missouri. The communities targeted for technical assistance are small agricultural communities who have expressed concerns about the impact of agricultural practices on their health, particularly in terms of water quality, asthma, and cancer occurrences.

**B. Informing People on Pesticides** - The Region 7 EJ Program, in collaboration with other EPA programs, is researching the migrant and seasonal farm workers in Region 7 population using baseline population data. This information will be used in addition to current available data: demographics, crops grown, and pesticides used. This information will be mapped using Geographic Information Systems (GIS) in an effort to visually capture the migratory patterns and/or population pockets that exist within EPA Region 7. This research will enhance the Agency's ability to identify areas where sensitive populations exist and where assistance and efforts can be targeted.

In addition to this ongoing research, the EJ Program has partnered with Harvest America Corporation (HAC) to educate and inform migrant and seasonal farm workers in Southwestern Kansas on pesticide safety and pesticide exposure risks. Harvest America Corporation was awarded a grant in the amount of \$30,000 for the Informing People on Pesticides (IPOP) Project over a period of one year. The IPOP Project will identify low-income migrant, and seasonal farm workers and their families in Kansas, and educational workshops to raise their awareness of pesticide safety and pesticide exposure.

C. ***GPRA Alignment (Link to Mission and Priorities):***

## *1. Regional EJ Program Link to GPRA Priorities*

EPA is in the process of redesigning its GPRA goal structure. After the Agency completes this redesigning, we will undertake a concerted effort to align our Region 7 EJ goals and strategies with the Agency's Government Performance and Results Act (GPRA) goals. This will be accomplished via the Regional EJ Action Plan. Progress and accomplishments will be achieved by each division and monitored and evaluated by the regional EJ program and regional management.

## *2. Program Integration of Environmental Justice*

Region 7 continues to make progress in the area of integrating EJ into specific programmatic areas/functions.

**a. Enforcement** - Region 7 has integrated EJ into cross program enforcement activities through multimedia coordination teams, the Enforcement Coordination Committee (ECC), and the Inspection Coordination Committee (ICC) Targeting Team. The outcomes and commitments of these two teams include:

- 1.) EJ is an indicator on the multi-media inspections checklist, which allows the region to identify potential EJ concerns proactively and to address them without complaints being filed;
- 2.) The use of EJ as targeting criteria for all inspections enables the Region to ensure that facilities that have potential environmental justice concerns be reviewed proactively; **[Goal I.D., Obj. 1]**
- 3.) EJ used in several programs as a criteria for identifying enforcement targets, allowing the Region to use the enforcement tool proactively in the areas most likely to have the potential to suffer a disproportionate environmental burden; **[Goal I.D., Obj. 3]**
- 4.) EJ used as a criteria to identify targets for compliance assistance. **[Goal I.D., Obj. 3, 4]**

**b. Permitting** - EJ is one of the review criteria of EPA-issued permits as well as state-issued permits commented on by the Region. Proposed permits which are identified to have potential EJ concerns are reviewed to identify potential EJ concerns as methods to address these concerns through the permit process. Enhanced public participation is one of the common suggestions for proposed permits which have potential EJ concerns. **[Goal I.G., Obj. 1]**

**c. Outreach and Education** - Raising awareness of environmental issues and acknowledging their importance to communities that have EJ issues or potential EJ concerns have long been a key component to Region 7's efforts to ensuring fair treatment and meaningful involvement. We understand that a knowledgeable public is more likely to have meaningful involvement in the decision-making process. For specific commitments of Region 7 in the programmatic areas/functions, refer to the Matrix. **[Goal 3, Obj. 1,2]**

3. *Performance Partnership Agreements (PPAs) and Performance Partnership Grants Addressing (PPGs) EJ* - Region 7 will bring the concern of addressing EJ through PPA's and PPG's to the state negotiating table for FY04-05. The goal will be to have EJ principles recognized as an approach or tool that should be considered in addressing state priorities. [Goal 4, Obj. 2]

### **III. INTERNAL ORGANIZATIONAL ENGAGEMENT:**

#### **A. On-going mechanisms to engage with other programs**

The EJ program staff have numerous opportunities to engage with other programs through participation on several regional coordination teams as well the EJ multi-media coordination team or the EJIT (refer to xx for full description of the EJIT). Among the teams which the EJ staff participate on are:

1. Cross Media Team - This team has the responsibility for coordinating efforts and activities by programs which are cross media by nature such as Brownfields, Pollution Prevention, and Community Based Environmental Protection.
2. Outreach Team - This team is responsible for developing a regional strategy for outreach activities. EJ is being incorporated into this strategy to ensure that specific focus is placed upon providing information to disadvantaged communities regarding environmental issues.
3. Sensitive Populations Team - The sensitive populations team is responsible for identifying environmental and health related priorities for children, the elderly, and individuals with compromised immune systems. This team looks for the connection between priorities for sensitive populations and environmental justice on an on-going basis.
4. Regional Indian Workgroup - The Regional Indian Workgroup is responsible for cross program coordination in regional activities on Indian Land. As environmental justice concerns are raised on Indian Land this team is responsible for ensuring a coordinated response.
5. Enforcement Targeting Team - The Enforcement Targeting Team is responsible for reviewing permitted facilities with other environmental and health factors to identify multimedia enforcement targets. This team has made EJ one of several targeting criteria. The goal of this team is to ensure that those areas with the greatest environmental burdens and the greatest risk to human health benefit from regulatory environmental controls.

Regional EJ staff also have the opportunity to communicate with EPA HQ and other regions through participation in the EJ coordinators conference calls, EJ Small Grants conference calls, EJ Training Collaborative, GIS workgroup conference calls, as well as periodic national coordination meetings. [Goal II, B, Obj. 1, 2, 3, 4, and 5]

#### **B. Regional Development of Guidance to Staff Regarding Integration of Environmental Justice**

Region 7's EJ policy provides regional staff with an understanding of the priority

of addressing EJ concerns in all program areas. During FY 02, EJ staff conducted focus groups to begin the process of identifying opportunities to address EJ through specific program functions. The Region's next step to establishing specific steps which staff will employ to address EJ concerns, will be through the development of Standard Operating Procedures for enforcement, permitting, and outreach. The first function area for which procedures will be developed is within the area of enforcement. In preparation for the effort, EJ program staff and EJIT members participated in SOP development training in FY 02.

#### **IV. EXTERNAL STAKEHOLDER ENGAGEMENT:**

##### **A. Processes to Receive Input on EJ issues from External Stakeholders**

Region 7 employs the following mechanisms to receive input on EJ issues from external stakeholders:

- Outreach and Education Efforts - the region participates in numerous outreach activities such as community fairs, conferences, and workshops in which information is provided regarding EJ issues.
- EJ Listening Sessions/Forums - regional staff gain input regarding EJ issues by conducting EJ listening sessions and forums. In some cases, these activities are general and provide stakeholders the opportunity to receive information regarding any EJ issue, and in other cases these activities in regard to a specific EJ concern or complaint.

**[Goal III A. Obj. 1, 2, and 3]**

##### **B. On-going Mechanisms to Share Information with External Groups Regarding EJ** - The EJ program maintains the following communication mechanisms to share information with external groups regarding EJ issues:

- EJ Website - The Region 7 EJ website was developed with the customer in mind. The website is utilized by students, university professors, community members and organizations, regulatory staff, and regulated entities, the general public as we provide information that is useful to each group. We continuously seek feedback from these customers in regard to the website and upgrading it approximately twice a year. **[Goal II, A, Obj. 3]**
- EJ Update - For the past five years, the region periodically distributed the EJ Update, a document which communicates pertinent information to internal and external stakeholders regarding EJ. The Update includes information regarding EJ activities being carried out by the Agency, funding opportunities, educational information, up-coming events throughout the Region, and other EJ issues. The external mailing list for the EJ update is near 1,000. **[Goal II, A, Obj. 2]**
- E-Mail List - The EJ program has developed an e-mail distribution list



which enables the staff to communicate EJ information quickly and efficiently. The list consists of stakeholders from various sectors including students, university professors, community members and organizations, regulatory staff, and regulated entities. The information distributed may include funding information, education information, and event announcements. **[Goal II, A, Obj. 4]**

- Regional EJ Printed Materials - Region 7 develops and maintains the following printed materials to provide EJ information to external stakeholders:
  - EJ Fact sheet (English and Spanish)
  - EJ Brochure
  - EJ Update
  - EJ Community Involvement Fact sheet**[Goal II, A, Obj. 3]**

**C. *Identifying Stakeholders Who Could Benefit from Increased Awareness About EJ*** - The Region 7 EJ program uses the following tools and methodologies to identify stakeholders who could benefit from increased awareness about EJ:

- Mapping - The entire region has been mapped by census tract using low income and minority populations along with the presence of environmental hazards to proactively identify areas which may benefit from EJ awareness or being more engaged in the collaborative problem-solving. **[Goal I, C, Obj. 1 and 2]**
- Speaking Engagements and Outreach Activities - Region 7 EJ staff participate on average in more than 30 outreach activities and speaking engagements per year providing external stakeholders information regarding EJ issues and receiving information regarding stakeholders priorities. The region proactively targets a portion of this outreach in order to ensure that priority communities are reached. The majority of the activities are in response to requests. [Outreach and Education] **[Goal III, 3]**
- Increasing the EJ Network - On an on-going basis, Region 7 seeks to increase the EJ network in order to broaden our ability to identify stakeholders who could benefit from increased awareness. This is accomplished through attending meetings and conferences at which such stakeholders may be encountered. We also ensure that agency information is available in locations which are frequented by potential stakeholders.

**D. *Encouraging Collaborative Problem-Solving Among Stakeholders***

Collaborative problem-solving will be encouraged through the following means:

- Training - Collaborative problem solving will be included as a component of EJ training available to all stakeholders
- EJ Guidance and Complaint Process - Collaborative problem solving will be

encouraged as a tool in both the regional EJ guidance as well as the EJ complaint process.

**E. *Initiatives to address issues of persons with limited English proficiency***

Region 7 EJ staff have suggested the following as initiatives to address issues of persons with limited English proficiency:

- Identifying staff proficient in languages other than English who may be used as a resource
- Offering classes to teach staff languages other than English
- Identifying organizations which offer translation services in order to gain assistance
- Seeking new employees/interns proficient in languages other than English. [**Goal III, B**]

**F. *EJ Outreach Utilizing Informational Materials Translated in Languages Other than English***

Region 7 reviews the needs of the target audience for any outreach activity and when audiences are identified that may need materials translated in languages other than English, an effort is made to meet that need. A significant number of HQ and regional outreach and educational materials on priority environmental and health-related issues have been translated into Spanish. Additional effort should be made to translate into other languages as needed. [**Goal III, A, Obj. 1 and 2**]

**V. *DATA COLLECTION, MANAGEMENT, AND EVALUATION:***

**A. *Main Data Sets*** - Two main data sets have been identified as ways in which EJ information may be collected outside those mentioned in discussion on previous questions. They include:

- Environmental Justice Assessment - Region 7 has committed to including EJ assessments as a part of numerous work programs and programs (refer to attached Matrix). EJ has been incorporated as a screening criteria for decision-making in several regional programs and functional areas.
- Multi-media Inspection Checklist - EJ indicators are among the various issues reviewed by inspectors regarding the media programs, in some cases. This provides the region with the ability to verify concerns regarding EJ and in other cases, proactively identify potential EJ concerns. [**Goal I, D, Obj. 5**]

**B. *Best Practices and Lessons Learned*** -

**1.) EJ Complaint Process** - Region 7 has developed an EJ Complaint Process to ensure a consistent approach which involves management, appropriate program support, and an appropriate timely response to the concern or complaint. (Refer to EJ Complaint Process, Appendix E)

**2.) Region 7 EJ Annual Report** - Region 7 produces an annual report targeting all EJ

partners. Partners in this case are defined as anyone involved in addressing EJ concerns. Partners include internal program staff, state staff, other federal agencies, and community organizations. The report reflects efforts of the previous year along with tangible benefits resulting from those efforts. A focus has been placed on providing valuable information which reflects a measurable outcome.

**3.) Multilateral Coordination** - Region 7 has employed a coordinated approach to address EJ concerns which includes contacts from all appropriate EPA programs on a regional and HQ level, appropriate state programs, and federal agencies where appropriate. This streamlined approach allows for more effective and efficient responses to EJ complaints and concerns, seeks to avoid duplication of efforts, conflicting or confusing information distribution, and delayed responses due to uncoordinated processes. This approach does require new sensitivity to varied organizational values and protocols as well as a strong commitment to frequent communication.

**4.) Activity/Complaint Summary Reports** - As a regular part of any project work, initiative work, or complaint follow-up, a summary report is written which reflects approach, outcomes, and lessons learned. This information is distributed to stakeholders and is included in the regional bi-annual EJ accomplishments report.

**5.) EJ Interns** - The EJ program has remained committed to providing opportunities for students to gain experience in the environmental field and practical professional experience through internships. The EJ program has provided mentoring and guidance to numerous students from diverse racial and ethnic backgrounds from diverse geographical locations, and diverse academic disciplines. Within the last two years, the EJ program has had four students graduate from college while working for the program. Degrees obtained include: a Masters in Public Administration, a Bachelor of Science in Civil Engineering, and two law degrees. Two students have gone on to work for private industry and not for profit organizations, and two remain with the Agency.

**VI. PROFESSIONAL AND ORGANIZATIONAL DEVELOPMENT:**

- A. *EJ Training* - In FY'03, Region 7 in collaboration with other EJ trainers from states and tribes, plans to conduct EJ training for priority participants and future trainers and will tailor the Fundamentals Course to meet their needs. This includes offering EJ training to the rest of our regional staff; state staff, academia, federal partners, community groups, and industry.
- B. *EJ Staff Training Plan* - Region 7 has developed the following list of required training for FTE committed to the EJ program. The employee should complete the training listed below within one year of assignment to the EJ program. If specific courses listed are not available during this time frame, related courses may be substituted.

**Training Courses:**

Environmental Justice Fundamentals Training  
Environmental Justice Training, Train the Trainer  
Environmental Law,  
Project Management  
Technical Writing/Write it Easy to Read  
Project Officer Training  
Working with Communities for Environmental Health  
Public Speaking/Effective Presentations  
Negotiate to Win  
Basic Mediation Skills  
Basic Facilitation Skills  
Leadership  
Understanding Diversity in the Workforce

**Additional Activities:**

Environmental Justice site visit  
NEJAC Attendance  
Community Outreach and Education Activities

**Goal:**

The employee will gain a fundamental understanding of the subject of environmental justice and methodology used to identify and address environmental justice concerns.

The employee will gain a basic understanding of the programs within the Agency, their processes, and how environmental justice may be integrated into the programs.

**VII. ENVIRONMENTAL JUSTICE ASSESSMENT:**

Region 7 conducts environmental justice assessments consistent with the Draft Toolkit for Assessing and Addressing Potential Allegations of Environmental Injustice (Draft Toolkit), as updated on May 8, 2002. The toolkit forms a general outline of potential factors to be investigated while assessing environmental justice complaint. The Draft Toolkit was designed to be used on a “case by case basis”. Therefore, those issues that must be addressed in a given community are address in a community-specific form. The Draft Toolkit guided the community-specific form by referencing form by referencing an outline of potential environmental, demographic, and social indicators.

These indicators are arranged in a tiered problem-solving strategy that is set into four phases. (1) “Phase one of problem formulation, which establishes the context, management goals, and scope of the entire assessment”. This aids in the identification of the complaint, and allows for a more focused approach to researching the actual complaint. (2) Phase two is the collection of data regarding the community and identification of environmental stresses imposed on the community. These environmental stresses include, but are not limited to, “abandoned hazardous waste sites, urban runoff, and EPA regulated facilities.” (3) Phase three is an assessment of the

data collected in phase two to determine the adverse environmental and health impacts on the community. (4) Phase four consists of the evaluation of the overall data collected and the resolution of a disproportionate burden or lack of a disproportionate burden within the community. After Phase four, an action may be determined.

Two levels of assessment are included in the basic methodology of approaching an Environmental Justice complaint. The first is the screening level assessment, which is used to identify if environmental justice issues exist.

### **VIII. PROGRAM EVALUATION:**

Program Evaluation for integration of environmental justice in Region 7 is has been developed through the process of development of an annual work plan or action plan and recording progress on commitments through an annual accomplishments report. Regional commitments in the enforcement programs are also identified through the OECA MOA process and reported through the OECA Accomplishments Report process.

Regional staff continue to work towards effectively identifying methods to measure success for actions. Challenges have arisen regarding measures of success in areas such as community outreach and education and public involvement which must be addressed. Efforts have been made to identify tangible environmental benefits for all regional EJ activities. See attached Action Plan Matrix.

### **IX. CONCLUSION:**

Region 7 is committed to the integration of environmental justice into our programs, policies, and procedures. Efforts will continue in the areas of:

- Developing tools and training to enable staff to effectively address environmental justice issues;
- Using a multi-media approach to ensure fair treatment and meaningful public involvement in addressing EJ issues; and
- Working collaboratively with partners outside the Agency to address environmental justice issues.

The information provided in the action plan narrative and matrix indicate steps which move the region towards achieving environmental justice for all populations. We understand that implementation of new approaches will take place incrementally and therefore anticipate building upon the lessons learned in the past and increasing our effectiveness as we move into the future.

## FY04-05 ENVIRONMENTAL JUSTICE ACTION PLAN MATRIX

### Overarching Goal:

To integrate environmental justice into all EPA programs, policies, and activities that results in a measurable benefit to the environment and public health of affected communities.

### Objectives:

1. *Risk Reduction / Protect Environmental and/or Public Health* - To ensure equal implementation of environmental laws to achieve significant risk reduction which will improve the environment and/or public health of affected communities.
2. *Outreach and Communication* - To provide opportunities for meaningful involvement and ensure effective communication between the Agency decision makers and stakeholders, including all affected communities.
3. *Training* - To provide training for EPA managers and staff to enable them to incorporate environmental justice considerations into their decision-making process.
4. *Federal, State, Tribal, and Local Government Coordination* - To ensure effective coordination across all levels of government to address the environmental and public health concerns of affected communities.
5. *Grants and Contracts Administration* - To promote effective and efficient management of all grants and contracts to ensure that the environmental and public health concerns of affected communities are addressed.
6. *Environmental Justice Assessment* - To conduct an assessment of the environmental justice indicators within affected communities as part of the decision-making process.

**Objective 1. Risk Reduction / Protect Environmental and/or Public Health** - To ensure equal implementation of environmental laws to achieve significant risk reduction which will improve the environment and/or public health of affected communities.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
Provide support in the development of national EJ guidance and policies	Review comments will be provided on draft guidance and policies by the deadlines established by HQ.	Holistic development of national EJ guidance and policies which include and reflect regional issues and needs.		Althea Moses
Coordinate/oversee integration of EJ into regional program activities. Review and revise, as necessary, the Regional Interim EJ Policy.	By 2004, revised Regional EJ Guidance document which includes strategic steps for integration of EJ into programs including inspection targeting, enforcement, compliance assistance and permitting.	Increase number of program activities which routinely include EJ considerations in their processes.		Althea Moses

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
<p>Continue to work with MDNR and the St. Louis community to implement ozone and fine particulate reduction measures consistent with EPA's 8-hour ozone standard and fine particulate standard implementation rules to bring St. Louis back into compliance with the standard.</p> <p>Continue to work with state to promote alternative fuels and innovative emission reduction strategies such as diesel retrofits. Retrofit diesel school buses.</p>	<p>St. Louis area has improving air quality</p> <p>Health effects from high ozone and fine particulate levels reduced</p> <p>2.6 million people in St. Louis metropolitan area breath air having an 8-hour ozone concentration of less than 0.08 ppm.</p>	<p>Air quality monitoring data demonstrates that the St. Louis area has attained the 8-hour ozone standard by the appropriate date. (The attainment dates depend upon structure of the final implementation rule and could be either 2007 or 2009.)</p> <p>Air quality monitoring data demonstrates that the St. Louis area has attained the fine particulate standard by the appropriate date.</p>		<p>Ozone - Lee Daniels</p> <p>Particulate - Jim Hirtz</p> <p>Diesel Retrofit - Heather Hamilton</p>



Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
<p>Continue to work with MDNR and the Kansas City community to implement ozone reduction measures consistent with EPA's 8-hour ozone standard implementation rule to bring Kansas city back into compliance with the standard.</p>	<p>Kansas City area has improving air quality.</p> <p>Health effects from high ozone levels is reduced.</p> <p>1.776 million people in Kansas City metropolitan area breath air having an 8-hour ozone concentration of less than 0.08 ppm.</p>	<p>Air quality monitoring data demonstrates that the Kansas City area has attained the 8-hour ozone standard by the appropriate date. (The attainment dates depend upon structure of the final implementation rule and could be either 2007 or 2009.)</p>		<p>Lee Daniels</p>
<p>Joint effort between ECO and APDB in the review of asthma data</p> <p>Evaluate point sources and monitoring data that may have an impact on the levels of asthma in children by November 2003. Evaluate monitoring and asthma data by Human Health Services through a grant administered by OEC.</p>	<p>Identify regional targeting priorities for multi-media [air??] assessments by fall 2004.</p>	<p>Improved targeting criteria for facilities and industrial plants [currently regulated under _____] based upon risks.</p>		<p>Jim Hirtz</p>

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Work with the Tribes in Region 7 on air issues. Award grants to support air related activities.	Tribes are conducting outreach, emission inventories, acquiring air quality training, and participating with EPA in air quality activities.	Improved knowledge, understanding and ability to address air quality issues by Tribes.		Judith Robinson
Conduct 5 Superfund cleanup actions in affected areas including areas located in minority and/or low income communities	By 2005, complete 5 removal actions in EJ areas where there are risks $>10^{-4}$	Increased number of people protected	\$1,000,000	Ken Buchholz
Conduct 10 Pre-CERCLIS Screens or other site assessment activities in affected areas including areas located in minority and/or low income communities.	By 2005, complete site assessment activities in 10 EJ communities.	Identify and assess human health threats in 10 communities and determine if population exposed or at risk.	\$200,000	Ron King
Conduct Tribal water system sanitary surveys	Inspection and compliance assistance to Tribal water systems	By 2008, 95% of the population served by community water systems in Indian Country will receive drinking water that meets all applicable health-based drinking water standards.		Pradib Dalal

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Include Environmental Justice as a targeting criteria for UST inspections	Inspections at facilities in potential EJ areas	Protection of ground-water		Stan Walker
By 2015, in coordination with other Federal Agencies, reduce by 50% the number of households on tribal lands lacking access to safe drinking water.	By 2005, identify water used by Community Water Systems as a source of drinking water for which State/Tribes, have wherever, adopted attainable water quality standards with public water supply as designated use, or for which States/Tribes have adopted water quality standards that provide an equivalent level of human health protection	Improved Access to Safe Drinking Water		Cheryl Crisler

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
<p>By 2008, the quality of water and sediments will be improved to allow increased consumption of fish in not less than 3% of the water miles/acres identified by States/Tribes as having a fish consumption advisory in 2002. (2002 Baseline: 485,205 river miles and 11,277,276 lake acres were identified by States/Tribes in 2002 as having fish with chemical contamination levels resulting in an advisory of potential human health risk from consumption.)</p>	<p>By 2008, fish tissue will be assessed to support waterbody-specific or regional consumption advisories or a determination will be made that no consumption advice is necessary for at least 40% of lake acres and 20% of river miles.</p> <p>By 2008, EPA will assist and support the develop of a tribal fish advisory program so that at least 1 Tribe will have adopted and applied the national fish advisory guidance to make fish advisory determinations for local waters.</p>			

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
<p>Provide leadership, guidance and oversight of state/tribal worker safety activities, including implementation of worker protection standards and the certification and training programs for pesticide applicators.</p>	<p>State/Tribal participation in successful pesticide inspector workshops.</p> <p>Review all new pesticide applicator training manuals to ensure they adequately address required items.</p> <p>Participate in national worker safety work groups, conference calls and meetings.</p>	<p>Increased number of States/Tribes implementing worker protection standards and certification and training programs for pesticide applicators</p>		<p>Luetta Flournoy</p>

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
<p>Provide project management to the St. Louis diesel projects (Clean School Bus grant and ADM and Toyota supplemental environmental projects that are expected to fund diesel retrofit and alternative fuels projects</p> <p>Provide project management to engage school districts and other fleet operators in the installation of emission controls and/or use alternative fuels that will reduce emission of particulate matter, oxides of nitrogen and oxides of sulfur (PM, NOX and SOX, respectively)</p>	<p>Reduce PM, NOX &amp; SOX emissions from diesel sources</p> <p>Use standard model and fleet-specific data to calculate particulate matter, NOX and SOX reductions</p>		<p>CSB \$.6M HQ Grant</p> <p>ADM \$1.1M SEP</p> <p>Toyota \$1-5M SET</p> <p>.1 FTE</p>	<p>Marcus Rivas</p>
<p>Provide project management to the St. Louis air project</p>	<p>Measures to be developed</p>	<p>Reduce human and environmental risks from Air Toxics</p>	<p>CAP \$280k NSCAP \$120k MBG 210k .35 FTE</p>	

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Develop action plans and implementation strategies that will result in a reduction of asthma triggers in homes through air toxics and asthma triggers education. Promote community awareness and capacity to manage healthy air issues	Participate in asthma coalitions, promote pledge campaign in asthma initiatives, distribute clean air cleaning kits	Reduce human exposure to indoor environmental asthma triggers.		Marcus Rivas
By 2008, the percentage of the population served by community water systems that receive drinking water that meets health-based standards with which systems need to comply as of December 2001 will be 95 % (2002 Baseline: 93.6% of the population)	By 2008, the DWSRF fund utilization rate will reach 86%.  Number of DWSRF projects that have initiated operations.  The Percentage of DWSRF loan agreements made annually that will return community water systems to compliance	Increase in communities receiving drinking water which meets health-based standards.		Pradib Dalal

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Use EJ Tier 1 information in inspection targeting and prioritization. Continue targeting of RCRA, NPDES, 1018 lead disclosure form inspections and expand to include additional program areas such as Stationary Sources, SPCC, TSCA PCB, EPCRA Spill reporting, and Chemical Accident Prevention.	By 2005, EJ Tier 1 information will be incorporated into the factors considered planning and selecting inspection targets for the next fiscal year.	Improved environmental protection in potentially high risks areas.		Kris Goschen

**Objective 2. Outreach and Communication** - To provide opportunities for meaningful involvement and ensure effective communication between the Agency decision-makers and stakeholders, including all affected communities.

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Conduct EJ Listening Sessions	At least 1 EJ Listening Session is conducted annually in the region.	Citizens are able to provide input on EJ or environmental issues of concern in their community. Increased community awareness of EPA activities and better understanding of environmental issues and decisions which affect them.		Andri Jovan



<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
<p>Conduct additional meetings to further promote internal program integration/coordination between EJ and programs.</p>	<p>By mid-2004 will have meet with each Division to explore additional EJ and program linkages which might be areas for further EJ program integration.</p> <p>By end of 2004, identify those areas where development of SOPs, checklist or some other type of document identifying specific components of the program/process where EJ can be integrated would be of assistance.</p> <p>By end of 2005 complete the SOPs, checklist or other type of document for the areas identified.</p>	<p>Expand areas where EJ is integrated into programs. Provide for more consistent method (i.e. therefore more likely to happen method) of integrating EJ into routine program activities.</p>		<p>Althea Moses</p>
<p>Assist Office of External Programs (OEP) in supporting the program with their public participation activities.</p>	<p>Provide information regarding contact names and outreach media modes (e.g., newspapers, TV, radio) that may be most useful in EJ communities.</p>	<p>Increased public participation in EJ communities.</p>		<p>EJ Program Staff</p>

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Assist in the development of a Tribal Video which will promote better understanding of Tribal issues.	By 2005 video is completed.	Video promotes better understanding of Tribal issues and increases ability of others to effectively work with Tribes.		Monica Espinosa
Explore mechanisms to provide third party education (i.e. similar to TAB/TOSC program in OSWER) to communities on various environmental programs and processes in order to enhance meaningful public participation.	Identify at least 1 mechanism that may be used	Public has better understanding of environmental issues, regulations and processes so that they can understand the material that they are being given an opportunity to comment on during public comment periods.		EJ Program Staff/Office of External Programs
Develop and distribute a brochure covering basic Title V air permitting process	By 2005 brochure developed and begin distribution to communities.	Improved understanding and better participation of affected community		Don Toensing

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Conduct listening sessions, community meetings, public meetings, and other meetings with stakeholders related to specific sites in a manner that promotes community participation and meaningful involvement to the maximum extent possible.		Citizens provide input and engage with other stakeholder in discussions that affect the site assessment and cleanup decisions in their community. Increased community awareness of EPA program activities (i.e., cleanup, permitting, enforcement, etc...) which leads to greater public participation and trust in federal decisions.		Althea Moses
Create Brochure and Training on the basic Title V Permit Process	Outreach materials for public regarding Title V permit process	Greater informed and involved public regarding Title V permits. Decisions which have greater public consent in the permit process		Don Toensing
Create Checklist and/or training on construction or Title V permits for state staff	Training materials for state staff regarding Title V and Air permit process	Meaningful public participation in the permit process		Don Toensing

**Objective 3. Training** - To provide training for EPA managers and staff to enable them to incorporate environmental justice considerations into their decision-making process.

Activity	Output	Outcome	Resources (FTE/\$)	Lead Contact
Conduct 4 Fundamentals of Environmental Justice training courses to internal and external groups.	By 2004 approximately 120 participants have completed the basic EJ training.	Increased awareness and available tools such that audience has increased ability to integrate EJ considerations into their daily responsibilities.		Monica Espinosa Andri Jovan
Build training capacity by providing EJ Train the Trainer workshop. (Identify 10% of the EJ Fundamental participants as potential future EJ trainers.)	By 2005, hold at least 1 Train the Trainer workshop (Target 5% of the EJ training participants to participate in the workshop.)	A Region 7 EJ training core group is established which can provide ongoing training in the region.		Monica Espinosa
Research opportunities to hold EJ training in conjunction with other multi-cultural, environmental, or community involvement events.	At least 1 training opportunity in conjunction with another existing event will be identified in each state.	Makes EJ training available to a broader group of participants while saving time and resources expended.		Monica Espinosa Althea Moses
Provide support to the National EJ Training Collaborative				Monica Espinosa

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>

**Objective 4. Federal, State, Tribal and Local Government Coordination** - To ensure effective coordination across all levels of government to address the environmental and public health concerns of affected communities.

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Conduct EJ Federal Partners Meetings	Conduct at least 1 EJ Federal Partners Meeting annually.	Increase knowledge of other federal partners EJ activities. Formulate and establish a network that can be leveraged to benefit EJ communities.		EJ Program Staff
Work with the other Federal/State/local partners in the region to establish and form a collaborative partnership that can address specific EJ concerns in the region.	Create partnership and identify at least 1 Interagency Working Group project.	Collaborative partnership assisted 1 community in addressing EJ issue(s) and served as model for future IWG projects.		EJ Program Staff
Coordinate and communicate with States and Tribes on EJ issues and concerns.	Hold at least one meeting with each State annually to discuss EJ	Better informed EPA, State and Tribal partners.		Althea Moses

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Perform an assessment of each States EJ program	Identify opportunities to increase/enhance EJ program in each state. Incorporate/enhance EJ as a component in each State's PPA/PPG agreements.	Expanded State EJ program.		Althea Moses
Provide Technical Assistance to R7 Tribes to assess the condition of their environment, to help build capacity and to implement programs in Indian Country	Establishment of common goals among federal agencies and individual Tribes	Improved environmental and human health protection  Improved Tribal environmental programs		Marcus Rivas
Participate in the regional multi-disciplinary Land Re-Use Team. Provide expertise regarding community-based environmental protection, First Nation/Tribal experience, and pollution prevention.	The Land Re-Use Team will be working with one urban and one rural community to provide integrated comprehensive environmental services that will allow the subject property to be brought back into active use			Marcus Rivas

**Objective 5. Grants and Contracts Administration** - To promote effective and efficient management of all grants and contracts to ensure that the environmental and public health concerns of affected communities are addressed.

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Award and manage EJ small grants to local community groups.	\$50,000 is awarded to 5-6 grantees.	Communities are able to address environmental and health issues while building capacity to address other community issues.		All EJ Program Staff
Provide outreach and information to communities on grant opportunities including the Collaborative Problem Solving Grants.	Distribute information on grant opportunities via email, mail, conference calls, and outreach events (e.g., Missouri Black Expo, Migrant Farm workers Young Mothers Group, etc...)			Monica Espinosa Debbie Bishop
Participate in EJ Grant policy development.	Participate in national grant conference calls and meetings. Review and comment on policy and guidance.			Monica Espinosa
Participate in development of regional grants policy and procedures as part of GCRC.				Monica Espinosa

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Plan, coordinate, and host Region 7 Small Grants Workshop.	Annually hold regional small grants workshop.			Andri Jovan
Assist/support other programs in their grant review process.		Increased EJ perspective is brought to other program and the grants awarded.		EJ Program Staff

**Objective 6. Environmental Justice Assessment** - To conduct an assessment of the environmental justice indicators within affected communities as part of the decision-making process.

<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Finalize regional EJ Assessment Protocol	By 2005 have a final regional EJ Assessment protocol	Consist and documented approach to assessing potential EJ areas of concern.		Debbie Bishop
Conduct EJ Assessments	Complete full EJ Assessment for 100% of EJ complaints. Complete EJ Assessment Screens for 95% of requests.			Debbie Bishop



<b>Activity</b>	<b>Output</b>	<b>Outcome</b>	<b>Resources (FTE/\$)</b>	<b>Lead Contact</b>
Provide EJ Tier 1 Assessment Maps to all programs.	Provide EJ maps of the region to each program.	Programs better informed about potential EJ areas and can factor that information into program planning and implementation.		Debbie Bishop
Coordinate with NEPA program to ensure EIS fully address EJ considerations. Provide appropriate EJ assessments to support EPA NEPA decisions.		Improved Federal compliance with Executive Order on EJ.		Debbie Bishop
Provide EJ support to the Inspection Targeting Team.	Provide EJ maps and other EJ information on potential EJ areas that can be used to prioritize inspections and enforcement targets.			Debbie Bishop