



U.S. Environmental Protection Agency

ACTION PLAN TO INTEGRATE ENVIRONMENTAL JUSTICE

**THE OFFICE OF POLICY,
ECONOMICS, AND INNOVATIONS
ENVIRONMENTAL JUSTICE ACTION PLAN
2006 - 2007**

Office of Policy, Economics, and Innovation (OPEI) 2006-2007 Environmental Justice Action Plan And Activities Narrative

Section I: Executive Summary

The Office of Policy, Economics, and Innovation (OPEI) recognizes environmental justice as an integral part of Agency operations. Situated in the Office of the Administrator, OPEI supports the Agency's programs by providing cross-cutting regulatory policy and economic analysis and promoting innovations to achieve greater and more cost effective public health and environmental protection. OPEI also strongly promotes community collaboration and public involvement.

One of OPEI's ongoing key projects is to update the Agency's 22-year-old Public Involvement Policy. The new policy provides information, help and training to all EPA staff on how to best use public involvement in environmental justice communities. OPEI has several other projects underway that consider how EPA approaches environmental justice communities and provides choices to reach more effective and equitable environmental decisions. Another of OPEI's projects includes the Collaborative Problem Solving (CPS) Team. The CPS, through the Agency's Innovation Action Council, produced a white paper entitled, "Solving Environmental Problems through Collaboration", successfully promoted the use of the "Seven Keys to Successful Collaborative Problem Solving", and developed the draft action plan entitled, "Solving Environmental Problems through Collaboration – EPA Integrated Action Plan".

This Environmental Justice Action Plan outlines OPEI's key efforts and activities that apply environmental justice principles through public input, community involvement, collaboration and analysis. Examples of these efforts include:

- EPA's Innovation Strategy
- EPA Public Involvement Policy
- Collaborative Problem Solving
- Environmental Stewardship
- The America's Children and the Environment project
- The Community Based Environmental Protection program
- The Smart Growth program

- The Cumulative Exposure Project
- Innovative Demonstration Pilots
- The Innovation Catalogue
- The Reference Guide to Environmental Permits

OPEI Environmental Justice Policy

The Office of Policy, Economics, and Innovation (OPEI) supports EPA's mission by providing regulatory and policy review, economic analysis and by infusing innovation into programs for better, more cost-effective environmental and public health protection. The Office plans to remain proactive, ensuring the needs, issues, and concerns of environmental justice communities are addressed in Agency regulations, economic and risk analysis and innovative approaches.

Section II: Activities Narrative

The Office of Policy, Economics, and Innovation (OPEI) is engaged in several projects which demonstrate our understanding of and commitment to environmental justice. These projects meet the goals set forth in: Executive Order 12989, "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations", EPA's Public Involvement Policy, EPA's Collaborative Problem Solving activities, and the Administrator's November 2005 memo stressing the Agency's commitment to environmental justice.

MANAGEMENT ACCOUNTABILITY

Organizational Infrastructure and Management

OPEI's Office of Regulatory Policy and Management (ORPM) is responsible for managing the Agency's regulatory and policy development process and providing cross-cutting policy analysis to ensure that the Agency's regulations appropriately consider environmental, economic and health impacts. ORPM reviews scientific analyses, evaluates economic impacts and examines policy decisions for approximately 150 environmental regulations each year.

The National Center for Environmental Economics (NCEE) works to advance the theory and practice of economics and risk analysis within the agency. To achieve this goal the center provides leadership and guidance in the development of economic analysis for regulatory purposes; conducts scientific and technical reviews of risk assessments; conducts research in environmental economics and environmental science focused on human and ecosystem health; is actively involved in identifying emerging issues in environmental policy making and communicating these priorities to research scientists and economists within and outside the agency; participates in the development and modification of agency science policy in an evolving scientific landscape; and advances the quality of the agency's economic and risk assessments by developing guidance materials.

The National Center for Environmental Innovation (NCEI) works to advance innovative environmental management strategies that provide stronger, more cost-effective environmental results. Fostering innovation at EPA, the center also:

- Provides a testing ground for innovative ideas that advance environmental protection
- Helps EPA's national programs and regions to adopt innovative policies and programs
- Supports improved environmental performance in business, communities, and state, tribal and local governments

Operational Resources/Program Support

OPEI integrates environmental justice activities into its daily operations through staff meeting discussions and OPEI specific training sessions. OPEI does not usually identify specific budget items as related to environmental justice.

An estimated 2.0 FTE in OPEI work on environmental justice issues and projects. This number reflects the compiled efforts of several people, including members of the OPEI EJ Team (see below), who spend between five and 25 percent of their time on EJ activities. Based on recent staffing changes, OPEI expects that this number will increase in the coming year. Ongoing and upcoming projects that will account for that increase will include work on EJ elements of the new public involvement policy and the CARE project

OPEI Environmental Justice Team

OPEI is engaged in a wide array of activities which range from economic analysis to sector strategy initiatives to regulatory management. As such, incorporating environmental justice considerations into our work requires a coordinated effort. Led by the OPEI Deputy Associate Administrator, OPEI's EJ team includes representatives from each part of the office and works collaboratively to disseminate information to OPEI staff on environmental justice, and to develop and implement the OPEI EJ Action Plan. As an outcome in developing the current action plan, the OPEI EJ Team now meets once a month.

OPEI's Environmental Justice Activities

The Office of Policy, Economics and Innovation developed **EPA's Innovation Strategy** (<http://www.epa.gov/opei/strategy>) at the request of the Administrator and Deputy Administrator, with input from senior staff from across the Agency. This strategy drives OPEI's current efforts to integrate environmental justice into our innovation programs.

Environmental Innovation can help solve significant environmental problems in environmental justice communities, adding to the tools that EJ stakeholders already use. For example, EPA's new Public Involvement Policy revised by OPEI provides advice and guidance on effective public involvement, including working with environmental justice communities in EPA decisions.

The Smart Growth program works with communities on transportation issues to revitalize densely populated urban communities. The Community Based Environmental Protection (CBEP) program supports community-based environmental approaches to address the problems of a particular watershed, ecosystem or other geographic area.

INTERNAL ORGANIZATIONAL ENGAGEMENT

OPEI is committed to identifying opportunities to integrate environmental justice into specific project activities. We closely monitor our regulatory policy development, economic and risk analysis, innovation strategies, voluntary programs, evaluation and to ensure that equitable outcomes have been carefully considered.

OPEI's Office of Regulatory Policy and Management reviews Agency regulations to ensure that they comply with Executive Order 12989 and are responsive to public comments, including those provided by EJ community members and organizations. ORPM is currently working with the Office of Environmental Justice and other Agency program offices to explore ways to improve how the Agency considers environmental justice in the Action Development Process.

EXTERNAL STAKEHOLDER ENGAGEMENT

Several OPEI programs and projects demonstrate the office's commitment to Environmental Justice on a continuing basis:

CARE (Community Action for a Renewed Environment) is a new initiative designed to establish a series of multi-media, community-based and community-driven projects to reduce toxic pollution. Targeted communities include those with environmental justice concerns, similar to work underway in St. Louis, Cleveland and South Phoenix. OPEI is leading an agency workgroup to reach out to regional offices, states (through the Environmental Council of the States) and the NEJAC for feedback on the program design and management plan. The team will also issue a community resource guide. This print and online portal will help interested communities access the wide variety of community-based information that EPA offers.

CARE will encourage community efforts to focus resources on the greatest risks and build consensus to mobilize local resources to this end. Two categories of competitive grants will be awarded: smaller grants (\$50-\$100k) to help assess toxic exposure problems and larger grants (\$300-\$500k) to leverage local projects that measurably reduce risks.

Smart Growth (<http://www.epa.gov/smartgrowth>) is beneficial construction development that serves the economy, the community and the environment. It moves the development debate away from the traditional growth/no growth question to "how and where new development should be accommodated." Smart growth, like environmental justice, recognizes the many benefits of growth. It also recognizes connections between development and quality of life. More detailed descriptions of Smart Growth projects are listed below.

Community Based Environmental Protection (CBEP) (<http://www.epa.gov/ecocommunity>) integrates environmental management with human needs, considers long-term ecosystem health and highlights the positive correlations between economic prosperity and environmental well-being. CBEP posits that collaboration between diverse stakeholders within a specific geographic area facilitates: comprehensive identification of local environmental concerns; setting priorities that reflect overall community concerns; and forging comprehensive, durable environmental solutions.

The Partnership Programs Coordinating Committee (PPCC) (<http://www.epa.gov/partners>) is a forum to support EPA's voluntary programs and to communicate their successes. OPEI coordinates the PPCC. The committee fosters information sharing among partnership programs, avoids duplication of effort, improves resource use and promotes common approaches to evaluation and performance measurement. The voluntary programs in the PPCC show how EPA can work with various programs, at headquarters and in the regions, to achieve real environmental results and cut costs along the way.

EPA works with more than 11,000 organizations that set voluntary environmental goals and make commitments such as conserving water and energy or reducing greenhouse gases, toxic emissions, solid waste, indoor air pollution and pesticide risks. These efforts help our environment as partners make processes more efficient and to use their resources more effectively. Partners include small and large businesses, citizen groups, state and local governments, universities and trade associations.

Innovative Demonstration Pilots are part of a national program that allows state and local governments, businesses and federal facilities to develop innovative strategies with EPA. Together, we gain more cost-effective environmental and public health protection. In exchange, EPA allows regulatory, program, policy or procedural ways to conduct the innovations. The Innovative Demonstration Pilot program actively invites and engages external stakeholder involvement.

EPA's Public Involvement Policy was developed in OPEI. The Policy provides advice and guidance on effective public involvement in EPA decisions. To seek more information from the public, OPEI hosted an award-winning online discussion in July 2001 (<http://www.network-democracy.org/epa-pip/welcome.shtml>) "Improving Public Involvement in EPA Decision Making."

The dialogue included EPA staff and panels of experts, joined by a cross-section of individuals who shared their thoughts and ideas. During ten days, the participants discussed various elements of EPA's draft Public Involvement Policy. Each day, this web-based discussion allowed members of the public to discuss specific topics at their convenience. A revolving panel of public involvement professionals discussed the main aspects of the draft policy with roughly 1,100 participants. The dialogue demonstrated how citizens, representatives of industry, environmental groups, small business, states, local governments, tribes, and other groups could learn more about the policy and share their concerns with EPA.

Since the policy was launched, the work group of EPA public involvement practitioners has met to prioritize the work plan that will help improve public involvement at EPA. Project staff has initiated discussions with OEJ staff about areas of common ground for EJ and public involvement work. The public involvement work group will meet with OEJ staff in February 2004 to learn more about current EJ priorities and what mutually supportive opportunities they can develop. Some areas of common ground for EJ and public involvement work include:

- Offering EJ training with a public involvement module for OPEI managers and staff
- Offering public involvement tools and training to members of the National Environmental Justice Advisory Committee and EPA's EJ coordinators
- Using EJ collaborative problem-solving projects as public involvement "showcase" projects which demonstrate effective public involvement activities
- Offering public involvement evaluation and accountability tools (templates, surveys, database) for use by the NEJAC, EJ coordinators and others interested in improving public involvement in EJ communities

Collaborative Problem Solving (CPS)

The CPS, through the Agency's Innovation Action Council,

- Produced a white paper entitled, "Solving Environmental Problems through Collaboration",
- Successfully promoted the use of the "Seven Keys to Successful Collaborative Problem Solving", and
- Developed the draft action plan entitled, "Solving Environmental Problems through Collaboration – EPA Integrated Action Plan".

The CPS has convened a Network of Collaboration practitioners that reflects the full range of programs and functions in which EPA's collaboration expertise resides, including environmental justice and alternative dispute resolution.

The Network has two major goals:

1. Facilitate the sharing of information, experiences, tools and strategies with one another and, in turn, others within network member's own organization; and
2. To provide input to/feedback on other tools, services, or activities developed under other elements or future phases of the Action Plan.

Environmental Stewardship

On November 9, 2005, the EPA Innovation Action Council (IAC) submitted a report to Administrator Johnson entitled, "Everyday Choices: Opportunities for Environmental Stewardship". The report suggests five major categories of options for EPA to enable and

encourage environmental stewardship among individuals, companies, communities and government organizations:

1. Focus on priority environmental problems where stewardship has greatest potential.
2. Engage individuals in environmental stewardship.
3. Showcase best practices and accomplishments.
4. Lead by example.
5. Mainstream stewardship in EPA decision processes.

ECONOMIC and RISK ANALYSIS and PROGRAM EVALUATION

Economic and Risk Analysis

Current and Completed Research Projects

- Completed and published the second edition of *America's Children and the Environment*, the Agency's second report on trends in environmental factors related to the health and well-being of children in the United States. This report brings together, in one place, quantitative information from a variety of sources to show trends over time in levels of environmental contaminants in air, water, food and soil; concentrations of contaminants measured in the bodies of children and women and childhood illnesses that may be influenced by exposure to environmental contaminants. Disparities by race and ethnicity are shown, where feasible.
- Published "Closing the Research Loop: A Risk-Based Approach for Communicating Results of Air Pollution Exposure Studies" in Environmental Health Perspectives. This is based on work in South Baltimore, MD, where EPA has conducted many environmental justice activities. Manuscript online at EHP-Online: <http://ehp.niehs.nih.gov/docs/admin/newest.html>
- Completing the first case study for Risk Assessment for Benefits Analysis--a multi-office, multi-disciplinary effort to develop dose-response functions for human health effects that economists can use for environmental benefits analysis
- Developing indicators for chronic exposure to air pollution and using the indicators to analyze disparities in exposure by race/ethnicity and to evaluate potential differences in birth outcomes. Similar analysis is underway using the indicator to analyze asthma outcomes.
- Conducting epidemiology studies focusing on the relationship between adverse health

effects in children, specifically asthma and adverse birth outcomes and air pollution

- Revising EPA's *Guidelines for Preparing Economic Analyses*, which were released by NCEE in 2000. The *Guidelines* provide sound scientific framework for analyzing the economic impacts of environmental regulations and policies, and assessing the distribution of costs and benefits among various segments of the population, with a particular focus on disadvantaged and vulnerable groups
- Published the *Children's Health Valuation Handbook*, a companion document to EPA's *Guidelines for Preparing Economic Analyses* (2002). The *Handbook* is a reference tool for analysts conducting economic analyses of EPA policies when those policies are expected to affect risks to children's health.
- Participating in the Risk Assessment Forum's Cumulative Risk Tech Panel workgroups. The purpose of the workgroups is to clarify technical issues presented EPA's Framework for Cumulative Risk Assessment and begin to lay the foundations for development of cumulative risk assessment guidelines.

Future Projects

- Applying a public approach to develop national indicators to assess the environmental health of minority populations. These indicators may facilitate tracking progress of programs and policies aimed at bringing about increased environmental equity
- Using of Geographic/Spatial Analysis to link source water pollution data to drinking water contaminant data.
- Researching important children's environmental health issues, such as exposure to air pollutants at school and child risks to air toxics
- Generating new data sets provide opportunities for improved assessment of general population exposure to environmental contaminants. Studies in this area may lead to development of enhanced exposure indicators for pesticides, and may be applicable to other classes of environmental contaminants. The project includes evaluating national biomonitoring data sets to develop indicators for pesticide exposures.

Program Evaluation and Performance Measurement

OPEI is responsible for evaluating key agency innovations, and increasing EPA's capacity to evaluate its work (<http://www.epa.gov/evaluate>). Evaluating EPA's innovations and programs improves public health and environmental protection, leads to continuous organizational improvement, supports more innovation and better informs management decisions. Through evaluation, EPA capitalizes on lessons learned and incorporates its experience into new environmental areas.

OPEI has supported the Office of Environmental Justice (OEJ) and the Federal Interagency Working Group on Environmental Justice (IWG). Leading an evaluation of a series of innovative demonstration projects, the office examined how to apply collaborative approaches to difficult environmental justice problems. The final report was reviewed by more than 100 individuals and organizations in environmental justice communities, government, and academia. The IWG and OEJ have used the report's results to make mid-course changes to the criteria and guidelines for their projects in 2003.

The Agency's EJ Steering Committee is developed and refined common measures for effective environmental integration in environmental justice issues. OPEI will assist OEJ in developing indicators for measurable goals and metrics. The EJ Steering Committee will provide guidance to all Headquarters and Regional Offices on how to incorporate these metrics in future EJ action plans.

OPEI's public involvement staff has developed evaluation and accountability templates, public involvement activity surveys and access to a relational database that can serve to support EJ work throughout the agency.

DATA COLLECTION, MANAGEMENT and PERFORMANCE MEASUREMENT

Data Collection and Management Tools in OPEI

The Innovation Catalogue, (<http://intranet.epa.gov/innovation/catalog>)OPEI's dynamic record of innovative projects from across the Agency. The catalogue is an effective tool for internal organizational engagement. This Web-based, searchable database allows users to easily identify specific projects and access information about the geographic-specificity of the project to the GPRA goals addressed. Users can search innovative Agency activities based on issues such as environmental justice, innovative tools, innovative approaches and many other criteria. EPA staff can identify best practices and lessons learned, and keep abreast of the latest Agency innovation activities.

OPEI has finished the catalogue and is exploring a project on Agency Environmental Justice Performance Measures.

Measuring OPEI's Environmental Justice Performance

OPEI is engaged with OEJ in developing an ongoing evaluation protocol that will serve the agency's needs to analyze data and effectiveness. OPEI's EJ team will meet periodically with OPEI's Deputy Associate Administrator to review progress on the Office's EJ projects.

PROFESSIONAL and ORGANIZATIONAL DEVELOPMENT

OPEI encourages all staff to expand their knowledge base by taking part in Environmental Justice training sessions. We continue to encourage staff to attend courses offered by the Office of Environmental Justice and have developed EJ training which is tailored to the needs of OPEI staff and is scheduled to be presented in January and February 2006.

One proposal is to offer a new round of basic EJ training that includes training specific to EPA's new Public Involvement Policy, as one office has successfully done. The policy tools include materials directly related to public involvement work with environmental justice

The human capital aspect of EJ work can be addressed with exploring specific knowledge, skills and ability (KSAs) criteria for specific position descriptions, specifying measures for effective EJ work. OPEI is also exploring how to fulfill "teach-back" commitment which will give to EJ staff, managers and workers access to tools that are unique to our office's portfolio. OPEI will gain valuable learning from EJ representatives and they, in turn, will have access to a wider range of tools with which to make their work more effective.

2006 Environmental Justice Action Plan – Office of Policy Economics and Innovation, OPEI

Goal 1: Clean Air and Global Climate Change

Objective 1: Reduction in number of asthma attacks

Objective 2: Reduce exposure to air toxics

Activities	Output	Outcome	Point of Contact
Estimate the costs associated with environmental contributors to airway disease and the benefits associated with a reduction in those environmental hazardous air pollutants	Conduct research for publication	Increased awareness by EPA of positive impacts associated with reducing air pollution, particularly in urban environments	Deborah Burgin or Ian Lange OPEI/NCEE Tel: 202-566-0269 / 202-566- 2301 burgin.deborah@epa.gov lange.ian@epa.gov

Goal 4: Healthy Communities and Ecosystems

Objective 2: Collaborative problem-solving to address environmental justice issues

Activities	Output	Outcome	Point of Contact
Analyze the relationship between host compensation and municipal solid waste landfills, focusing on firm and community characteristics, risk and socio-economic variables,	Present findings at association meetings. Publish a paper in a peer-reviewed journal	Better understanding of the role of community, firm, and landfill characteristics in affecting the amount of compensation a community receives.	Robin Jenkins OPEI/NCEE Tel: 202-566-2292 jenkins.robin@epa.gov

Activities	Output	Outcome	Point of Contact
<p>The Public Involvement staff will continue to provide guidance on the “How-To’s” of engaging EJ communities in EPA’s decision-making process.</p>	<p>Make available and distribute the 10 Public Involvement Brochures. The titles include: How to Identify People to Involve, How to Involve Environmental Justice communities, and How to Plan and Budget for Public Involvement to name a few. The brochures are available at: www.epa.gov/publicinvolvement/brochures</p>	<p>Better understanding of the role of staff in involving the public in the EPA decision-making process.</p>	<p>Daria Willis OPEI/NCEI Tel: 202-566-2217 willis.daria@epa.gov</p>
<p>Distribute the “Solving Environmental Problems through Collaboration” white paper.</p> <p>Continued promotion of the use of the “Seven Keys to Successful Collaborative Problem-Solving.”</p>	<p>Make the report available to EPA staff nationwide</p>	<p>Better understanding of the role of Collaborative Problem Solving in addressing environmental issues and concerns nationwide.</p>	<p>Daria Willis OPEI/NCEI Tel: 202-566-2217 willis.daria@epa.gov</p>

Goal 4: Healthy Communities and Ecosystems

Objective 3: Revitalization of brown fields and contaminated sites

Activities	Outputs	Outcome	Point of Contact
<p>A team of economists from NCEE and analysts from OSWER's Land Revitalization Office (LRO) are working together to examine the theory and methods for measuring the social benefits, social costs, and economic impacts of land cleanup and revitalization.</p>	<p>(1) NCEE and LRO are developing the Handbook on Benefits, Costs, and Impacts of Land Reuse to assist program offices in assessing the effects of cleanup and redevelopment of contaminated sites. The Handbook will develop a theory of social benefits and costs of cleanup and reuse and will explore methods for estimating benefits, costs, and economic impacts of cleanup and reuse.</p> <p>Two specific topics that will be addressed are:</p> <ul style="list-style-type: none"> • <i>Gentrification</i>: To understand the consequences of cleanup and reuse, it may be important to understand the implications of gentrification, which may follow cleanup of contaminated sites and their subsequent reuse. The Handbook will explore the factors that determine if and when gentrification occurs, and the characteristics of the process by which an area undergoes such a change. • <i>Employment Effects of Reuse</i>: The Handbook discussion will 	<p>The overall objective of the Handbook is to provide technical assistance to policy makers and analysts in their efforts to understand the social welfare effects and economic impacts of cleaning up and reusing contaminated property.</p>	<p>Robin Jenkins OPEI/NCEE Tel: (202)566-2292 Jenkins.Robin@epa.gov</p>

	<p>go beyond the simple theoretical explanation of employment effects generally given by economists to reach a more insightful understanding of the employment effects of land reuse.</p>		
	<p>(2) REMI Modeling of Economic Impacts: This research will identify remediated sites and apply regional economic modeling tools to estimate impacts of redevelopment. It will compare effects at the county level to larger areas to examine the spatial distribution of impacts. The research will examine underlying regional economic data and evaluate the effectiveness of efforts to target particular industrial sectors. Several regional modeling tools will be employed (including input output, econometric, and computable general equilibrium models), allowing for a simultaneous evaluation of the relative strengths and weaknesses of the models and the robustness of the conclusions.</p>	<p>The objective of the REMI analysis is to inform policy makers by estimating the economic impacts of several reuse projects at two or more levels: on the county, and on the immediate multi-county area. The analysis may also generate an estimate of the state level economic impact if the multi-county regional economic impact is significant. This will include impacts such as employment, output and value-added for the directly affected sector(s) as well as economy-wide regional measures. It may also be possible to test for the presence of agglomeration effects, economies of scale, or productivity effects that would lead to social benefits of land reuse.</p>	<p>Jared Creason OPEI/NCEE Tel: 202.566.2265 creason.jared@epa.gov</p>

Goal 5: Compliance and Environmental Stewardship**Objective: Ensuring Compliance**

Develop the major categories of options outlined in the report: Everyday Choices: Opportunities for Environmental Stewardship	To develop clear visions for environmental stewardship at EPA and to further develop the many environmental stewardship efforts already underway here at the Agency.	To enable and encourage environmental stewardship among individuals, companies, communities, and government organizations.	Daria Willis OPEI/NCEI Tel: 202-566-2217 willis.daria@epa.gov
---	--	--	--

Goal: Cross Cutting Strategies**Objective: Internal Capacity-Building (e.g., training, internal program management)**

Activities	Output	Outcome	Point of Contact
Provide support to program offices considering EJ impacts related to rules as warranted, and review regulatory impact analyses (RIAs) of major rules for consideration of potential EJ impacts	Published RIAs that properly consider equity impacts	Adherence to analytic requirements of EO 12866 and EO 12898	Jennifer Bowen OPEI/NCEE Tel: 202-566-2281 bowen.jennifer@epa.gov,
Continue to provide Environmental Justice Training to OPEI staff	Develop and conduct multiple EJ training sessions for OPEI staff to ensure proper understanding of Environmental Justice concerns	Adherence to analytic requirements of EO 12898	Daria Willis OPEI/NCEI Tel: 202-566-2217

	and issues.		willis.daria@epa.gov
<p>Work with OEJ to ensure that regulatory workgroups properly evaluate EJ by addressing EO 12898 in the “Statutes and Executive Orders” of relevant actions.</p> <p>Facilitate cross-Agency participation in the action development process for rules with potential EJ implications</p>	<p>Draw attention to EJ concerns early in the action development process.</p> <p>Add a question on the “action initiation form” (e.g. Does this action involve environmental health risks that pose disproportionate risk to low income and racial and ethnic minority communities or populations?) to flag actions that may have EJ implications for participants on the Regulatory Steering Committee.</p> <p>Review the RAPIDS searchable database of new actions being developed that may disproportionately or adversely affect certain communities.</p>	<p>EPA rule writers consider EO 12898 and conduct analysis of actions that may disproportionately affect certain populations as core requirements in action development.</p> <p>EPA staff are aware of EJ implications in regulatory actions</p>	<p>ORPM/RMD/RAPD</p> <p>ORPM/RMD</p>

<p>Work with OEJ to ensure that regulatory workgroups properly evaluate EJ by addressing EO 12898 in the “Statutes and Executive Orders” of relevant actions.</p>	<p>Draw attention to EJ concerns early in the action development process</p>	<p>EPA rule writers consider EO 12898 and conduct analysis of actions that may disproportionately affect certain populations as core requirements in action development.</p>	<p>ORPM/RMD</p>
<p>Revisit ORPM trainings related to the Action Development Process for opportunities to highlight Environmental Justice considerations.</p>	<ul style="list-style-type: none"> - Enhance discussion of EJ issues in existing training for regulatory development. - Develop and deliver EJ training OPEI-wide 	<p>Higher awareness of EJ concerns and how to weave them into various Agency processes.</p>	<p>ORPM/RMD</p>
<p>Provide training for the Regulatory Steering Committee on how EJ can apply to National and Regional rulemakings,</p>	<p>Provide two EJ training sessions, specifically for Regulatory Steering Committee</p>	<p>Key decision makers in the regulatory development have a vested interest in addressing environmental justice.</p>	<p>ORPM/RMD</p>