

DRAFT Region 7 Environmental Justice Action Plan Narrative Fiscal Year 2009

The mission of the U.S. Environmental Protection Agency is to protect human health and to safeguard the natural environment – air, water, and land – upon which all life depends. EPA Region 7 is committed to providing fair treatment to all communities we serve. Accordingly, this action plan was developed as a tool to assist in determining the appropriate actions and their measurable outcomes to ensuring that environmental justice is addressed into all the environmental operations within the region.

Regional Characteristics

Region 7 encompasses 286,000 square miles covering the states of Iowa, Kansas, Missouri, and Nebraska. There are also nine federally recognized tribes. Seven reside on reservations (the Iowa, Kickapoo, Omaha, Potawatomi, Sac & Fox, Santee Sioux, and Winnebago). The Meskwaki also reside in the region, but on a settlement. The Ponca reside on tribally owned lands dispersed throughout four communities in Nebraska.

The regional topography varies from the arid high plains of western Kansas and Nebraska to the forested sharp hills of the Ozark Plateau in Missouri, the corn belt of Iowa to the Mississippi River floodplain lowlands of eastern Missouri. In 1997 USDA reported that the four states accounted for 302,699 farms covering 151,607,569 acres. Farm products include corn, wheat, soybeans, grain sorghum, cattle, and hogs.

Though the landscape is dominated by agriculturally-related environmental challenges, the Region is not without urban concerns. More than half (56%) of the population of 12.9 million people live within several metropolitan areas including St. Louis, Kansas City, Omaha, Des Moines and Wichita. The metropolitan areas have traditional environmental challenges associated with urban centers—industry, municipal services, transportation, urban sprawl, air attainment, and energy production. In addition, the region contains hundreds of small communities with populations below 5,000—for example 90% of communities in Nebraska are under 2,500. Thus, there are the accompanying issues of declining tax bases and old infrastructures, limited access to health care, contamination of private water wells, lead mining contamination, and attaining clean water standards for water treatment and water supply systems.

There are five predominant languages spoken other than English in Region 7. They include: Spanish, German, Chinese, Vietnamese, and Serbo-Croatian. Spanish is the most commonly spoken language after English in all four states of the region. States range from a 2-5% Spanish-speaking population. German is the second most spoken language in Region 7. The data does not distinguish between German-speaking only or bilingual individuals. The two most spoken Asian languages are Vietnamese and Chinese. Kansas has a higher percentage Vietnamese speaking population than the other three states in Region 7. Serbo-Croatian speaking populations may be found in significant numbers within communities in Iowa and Missouri.

Region 7 Strategic Management Goals and Themes

- Facilitate a culture of innovation and collaboration across the region and throughout the country focused on aligning resources to achieving environmental outcomes.
- Build a strong and valued partnership between EPA Region 7 and agriculture focused on achieving environmental outcomes.
- Provide environmental leadership on climate change and energy.
- Strengthen the ability of EPA Region 7 to meet its environmental goals and objectives while improving internal operations.
- Strategically utilize all tools available to achieve and enhance compliance with environmental laws.

These regional goals and themes coincide very well with the eight national environmental justice (EJ) priorities:

1. Reduce Asthma Attacks
2. Reduce Exposure to Air Toxics
3. Ensure Fish and Shellfish are Safe to Eat
4. Ensure Water is Safe to Drink
5. Revitalize Brownfields and Contaminated Sites
6. Reduce Incidence of Elevated Blood Lead Levels
7. Ensure Compliance
8. Collaborative Problem Solving

The national EJ priorities are all relevant to Region 7 communities. While the national EJ priorities identify specific environmental and health related concerns along with approaches to addressing them, the Region 7 priorities help us to separate the total regional universe of concerns within the region and group them in a manner allowing for focused and measurable work.

Organization of the Action Plan Matrix

The Region 7 Environmental Justice Action Plan is organized consistent with the Agency Strategic Plan utilizing the five goal structure: Goal 1 - Clean Air; Goal 2 - Clean and Safe Water; Goal 3 - Preserve and Restore the Land; Goal 4 - Healthy Communities and Ecosystems; and Goal 5 - Compliance and Environmental Stewardship. A sixth goal, Cross-Cutting Strategies, has been added to include internal capacity building activities such as training and internal program management.

- **Objectives** include any of the eight national environmental justice priorities or other priorities identified by the region.
- **Activities** include any action undertaken in order to address an objective.
- **Outputs** describe the direct results of an activity. Output measures answer quantitatively the question: What was accomplished under each activity?
- **Outcomes** provide a description of the impacts resulting from an activity. Outcome measures answer the question: What impacts did the out/put activities have/make relevant to public health and/or the environment?

Management Accountability

A. Regional Environmental Justice Policy

The Region 7 Interim EJ Policy provides Region 7 staff a document which establishes a platform on which to base the implementation of environmental justice to achieve measurable outcomes that demonstrate fair treatment and meaningful 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 all 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 the decision-making processes. The Interim Policy has been organized along functional lines and is intended to cross media and programmatic divisions.

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.

The location of the EJ program in an office which has coordination responsibilities of enforcement provides the program an opportunity to be involved in the planning and prioritization for all regional enforcement programs. This connection has allowed the regional enforcement programs to accelerate the integration of EJ principles into their work.

C. Communication of Management Expectations

Regional management will continuously communicate expectations having to do with the integration of EJ into work processes and procedures. Ways of communicating these expectations:

1. The Interim Regional Environmental Justice Policy will be reviewed with all regional staff and reiterated on an ongoing basis as a regional priority.
2. Environmental Justice Training is provided on an annual basis for new employees and temporary employees in order to highlight the importance of EJ principles as well as promoting integration into the work of the Agency.
3. The region seeks to integrate EJ into all program areas and regional priorities. Examples of this include: 1) Farm Worker Protection outreach and education focusing on economically-disadvantaged and non-English speaking populations under the agriculture initiative and 2) economically-disadvantaged and non-English speaking populations participating in subsistent fish consumption.

Internal Organization Engagement:

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 initiative. 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 of all regional functions. The goal of the EJIT is to ensure that there are environmental justice considerations in all EPA operations within the four state region.

The Region 7 EJ program staff has numerous opportunities to engage with other programs through participation on several regional coordination teams in addition to the EJIT. Teams which include EJ participation:

- Regional Indian Workgroup
- Ag Team
- Energy Team
- Sustainability Team
- Children's Health Workgroup
- GCRC (Grants)

External Stakeholder Engagement:

- 1) 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:
 - a) Outreach and Education Efforts – The region participates in numerous outreach activities such as community fairs, conferences, and workshops in which information regarding environmental priorities and public involvement are shared with the public.
 - b) EJ Stakeholder Meetings/Forums – This is a tool used by regional staff to gain input regarding EJ issues and to increase efforts to address EJ concerns. In some cases these activities have provided stakeholders the opportunity to exchange information regarding any general EJ issue. In other cases these activities have been regarding a specific EJ concern or complaint.
- 2) Ongoing 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:
 - a) EJ Website – The Region 7 EJ website was developed with the customer in mind. We understand that the website is utilized by students, university professors, community members and organizations, regulatory staff, and regulated entities. We provide information which will be useful to each group. We continuously seek feedback from these customers regarding how to improve the website. The site is upgraded approximately twice per year.
 - b) 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 community members and organizations, regulatory staff, regulated entities, students and university professors. The information distributed may include funding information, news and educational information, and event announcements.
- 3) 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 EJ awareness:
 - a) Mapping – The entire region has been mapped by census block group and 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 process.

- b) 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.
- c) 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 engaged. We also ensure that agency information is available in locations which are frequented by potential stakeholders.

Data Collection and Management:

Data utilized to conduct EJ screens, EJ assessments, and other research includes health data, compliance data, environmental data (i.e. air quality, impaired water bodies), and census data. The data is formatted and maintained by our Geographic Information Systems (GIS) staff and updated as new data becomes available.

In those situations in which new or additional data is needed agency experts are engaged and data is gathered and maintained in a manner which is consistent and compliant with Agency standards.

Additional information may be utilized from other governmental entities to assess or evaluate a particular concern. This information is generally publicly accessible information which is gathered and presented in a manner which is consistent with national standards.

Professional and Organizational Development:

EJ staff work continuously to build skills to effectively work with stakeholders, including problem solving and forward thinking to progress the EJ mission. Professional and organizational development efforts include training in the following three subsets: 1) environmental/health training 2) professional development, and 3) organizational development. The following activities and trainings are examples which Region 7 EJ staff has undertaken:

A. Environmental/Health/Technical Training:	B. Professional Development:	C. Organizational Development:
<ul style="list-style-type: none"> ▪ Superfund Reuse and Revitalization ▪ Brownfields Nuts n’ Bolts ▪ Chemistry for Environmental Professionals ▪ Healthy Homes ▪ ArcView GIS ▪ Basic Inspector Training 	<ul style="list-style-type: none"> ▪ Risk communication ▪ Media relations ▪ Getting work done and achieving results ▪ Conversational Spanish ▪ Grants Management ▪ Contracts Management ▪ Executive Leadership 	<ul style="list-style-type: none"> ▪ Human Capital Strategy ▪ Working Effectively with Tribal Governments ▪ Standard Operating Procedures

A. Environmental/Health/ Technical Training:	B. Professional Development:	C. Organizational Development:
<ul style="list-style-type: none"> ▪ Health and Safety Training ▪ Hazardous Materials Incidence Response Operations 	<ul style="list-style-type: none"> ▪ Systematic Development of Informed Consent ▪ Alternative Dispute Resolutions ▪ Meeting Management ▪ Facilitation 	<ul style="list-style-type: none"> ▪ Continuity of Operations ▪ CPR and First Aid

Environmental Justice Assessment Process:

Region 7 EJ staff became involved with potential EJ issues both proactively by identifying areas of potential concern, and in response to requests regarding potential EJ concern.

The first step to becoming engaged in addressing a potential EJ concern is through the information gathering process of an EJ screen or EJ assessment. The Region 7 EJ assessment methodology is consistent with the national EJ Toolkit for Assessing Allegations of Environmental Injustice. This assessment process is a two-tier process:

Tier 1 - Consider disproportionate impact:

- Proximity of permitted facilities to a community/impacted population
- Number/concentration of permitted facilities within a given parameter
- Number of Superfund/NPL sites
- Other regulated entities
- Environmental Indicators
- Environmental Conditions
- Ecological Indicators
- Health Data
- Health Impacts from the Environment
- Potential Vulnerability to Stressors

Tier 2 – Consider demographics:

- Minority populations
- Persons below poverty
- Languages spoken other than English
- Social Indicators
- Economic Indicators

Program Evaluation:

Region 7 develops a detailed workplan for EJ program staff and a larger bi-annual EJ Action Plan for the region. Each commitment includes a description of the activity outputs and outcomes along with committed programs and organizations. Region 7 has participated in the development of the national environmental justice program evaluation protocols as well as a pilot which included a review of Superfund lead mining clean-up sites. Current methods of evaluating success in the region are through the annual reporting of accomplishments resulting from the commitments in the workplan, and the EJ Action Plan. In FY09 Region 7 is committed to conducting one formal program review utilizing the national program review protocol.

Region 7 Environmental Justice Contacts:

Althea Moses – EJ Program Manager

Debbie Bishop – EJ Data and Research Lead

Monica Espinosa – EJ Training and Communications Lead

Kimberly Jones – EJ Grants Lead

Region 7 Environmental Justice Implementation Team:

Barbara Peterson – Regional Council

LaTonya Sanders – Office of Public Affairs

Raju Kakarlapudi – Water Division

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Steve Wurtz – Air and RCRA

Alma Moreno Lahm – Brownfield

Wolfgang Brandner – Tribal Program

Roberta Vogel-Leutung – Environmental Services

Carlin Hafiz – Children’s Health

EJ ACTION PLAN PERFORMANCE MEASURES MATRIX

Region 7 Environmental Justice Action Plan

Section 1: Performance Measures Matrix Highlights

FY09 Robust-Results Oriented Activities

Description: Omaha Lead

The Omaha Lead site, which is located in Douglas County, Nebraska, includes surface soils present at residential properties, child care facilities, schools, and other residential-type properties in eastern Omaha. Although exact site boundaries have yet to be defined early estimates of the potentially impacted area cover 16, 448 acres (25.7 miles) where approximately 86,826 residents live.

In 1998, the Omaha City Council solicited assistance from EPA in addressing problems with lead contamination in the Omaha area, prompted by clean-up activities at the Asarco facility. Asarco was a lead-refining plant which operated from the early 1870s until 1997 and was located on approximately 23 acres on the west bank of the Missouri River in downtown Omaha. During the operational period, lead and other heavy metals were emitted into the atmosphere through smoke stacks and fugitive emissions from plant activities. The pollutants were transported downwind in various directions and deposited on the ground surface.

Excerpted from: Omaha Lead, 07/03/07

Activities/ Resources/ /Partners	Output	Applicable Outcome Measure			Point of Contact
		Short-term (awareness)	Intermediate (behavior)	Long-term (condition)	
<u>Community Involvement</u> - Support of CAG with emphasis on seeking funding partners and comprehensive solutions to the lead issues EPA does not have authority to address.	- \$_Financial assistance provided to community organizations (CAG) - _# households provided technical assistance - _# Yards free of lead hazard (pollution)	-Increase awareness of all stakeholders -Partners/stakeholders are more aware of the challenges of working with disadvantaged and underserved	-Stakeholders sign access agreements - Stakeholders implement lead-safe practices -Children receive blood lead testing and proper	- Reduce the lead in soil at properties where children reside or spend extended amts of time. - Reduce elevated blood lead levels in children.	Name/Org: Tel: E-mail: Gene Gunn Robert Field Debbie Kring

Activities/ Resources/ /Partners	Output	Applicable Outcome Measure			Point of Contact
		Short-term (awareness)	Intermediate (behavior)	Long-term (condition)	
<p>- Operation of public Information Centers to provide the affected population with information regarding the affects of lead on children and the steps which residents can take to help reduce exposures to lead.</p> <p><u>Yard Clean-up:</u></p> <p>- Sampling Yards</p> <p>- Cleaning up soil at residences with soil lead levels exceeding EPA's action level.</p> <p>- Placing old soil with clean soil in yards and sodding yards to replace grass.</p> <p>- Stabilizing the exterior of the home where lead-based paint threatens to recontaminate the replacement soil</p> <p><u>Brownfields Job Training</u> Note: Though priority emphasis will be placed on support the Omaha site with Brownfields Job training, efforts will go beyond Omaha.</p>	<p>reduction)</p> <p>- _# Stabilized exterior of homes</p> <p>- _# Community outreach events.</p> <p>- _# Community information requests</p> <p>- # of participants in job training workshops</p> <p>- Brownfields job training cooperative agreement</p> <p>- # of program participants employed in full-time environmental work with an avg. hourly wage of \$_</p>	<p>communities</p> <p>-Partners/stakeholders are more aware of areas with elevated blood lead levels to target activities and resources</p> <p>Increased awareness regarding steps which may be taken to address the lead hazard(s) on ones property</p> <p>Increased awareness regarding technical and financial resources available.</p> <p>Build awareness of public health and environmental health issues related to Brownfields sites and the skills needed to remediate and redevelop brownfields properties.</p> <p>Build relationships with community orgs. community colleges, governmental entities, local employers and other community partners and</p>	<p>treatment if needed.</p> <p>- Increase effectiveness of outreach and education.</p> <p>- Improved understanding of Brownfields will lead to increased involvement in Brownfields assessment cleanup and redevelopment process for communities.</p> <p>Job Training program increases job skills of local community members in hazardous material cleanup, asbestos and lead paint abatement, general construction, industrial safety, CPR/first aid, etc.</p> <p>Local residents gain an opportunity to fund full-time employment remediating brownfields sites in their communities</p> <p>Brownfields assessment, cleanup, and redevelopment</p>	<p>- Measured by annual decrease in # of lead poisoned children.</p> <p>Improved integration of EJ in assessment cleanup and sustainable redevelopment of Brownfields sites.</p> <p>Improved public health and environmental conditions due to the assessment, clean-up, and sustainable redevelopment of brownfields sites in EJ communities.</p> <p>Sustained employment opportunities for local workers.</p> <p>Increase economic vitality and quality of life of local community</p>	<p>Steve Kovac Ina Square Alma Moreno-Lahm Althea Moses</p>

Activities/ Resources/ /Partners	Output	Applicable Outcome Measure			Point of Contact
		Short-term (awareness)	Intermediate (behavior)	Long-term (condition)	
<p>1. Educational and technical assistance to disproportionately impacted communities affected by Brownfields hazardous waste sites.</p> <p>2. Partner with Hazardous Materials Training and Research Institute (HMTRI) to assist in outreach and training with job training grantees, workforce development agencies , and nonprofit and community based organizations..</p>		<p>stakeholders.</p> <p>Local go's. and nonprofit orgs. Become informed on the requirements needed to develop a brownfields job training program.</p> <p>Local residents have opportunity to participate in worker education and training in their communities.</p>	<p>projects are conducted in more communities.</p>		

DRAFT Region 7 FY09 Environmental Justice Action Plan

Section 1: Performance Measures Matrix Highlights Continued

Description: Healthy Homes Community Initiative

The home is a system where its working is interrelated as are its problems. The National Center for Healthy Housing reports that in the American Housing Survey of 2005, 2 million homes had severe problems. 4.2 million homes had moderate problems – and this rating system did not include insects, humidity and condensation, lead-based paint, radon, and asbestos.

The quality of housing significantly affects the health of the individuals who live in them. Asthma rates are 40-50% higher among children of color living in U.S. cities. Children from low income communities are more likely to be lead poisoned than their wealthier counterparts. The annual costs for environmentally attributable childhood diseases in the U.S.: \$54.9 billion. This does not include the additional costs for the estimated 10 million school days missed a year due to complications from asthma.

Historically education has been presented categorically (allergens/asthma, asbestos, lead, mold and moisture, insects/rodents/pesticides, weatherization/energy conservation, radon,).

We are proposing an integrated approach that recognizes the home as a system and considers: a) people living in the home, b) the structure, and c) potential health hazards.

Activities	Output	Applicable Outcome Measure			Point of Contact
		Short-term (awareness)	Intermediate (behavior)	Long-term (condition)	

Activities	Output	Applicable Outcome Measure			Point of Contact
		Short-term (awareness)	Intermediate (behavior)	Long-term (condition)	
<p>1. Develop partnerships and agreements with organizations who are currently working separately on various aspects of health in the home.</p> <p>2. Develop educational approach and training materials. .</p> <p>3. Train the Trainer sessions in neighborhoods and communities with poor housing conditions and disproportionate health impacts which may be related to the housing conditions.</p> <p>4. Marketing Campaign – utilize media outlets to increase awareness regarding the connection between quality housing and health and promote the steps one may take to make a home healthy</p> <p>5. Community Outreach and Education and Education Events -</p>	<p>Materials in “plain English” which 1) provides relevant information in recognizing the priorities and values of the audience; and 2) clear steps one may take to address concerns within their home.</p> <p>_ # of community train the trainer sessions</p> <p>_# of community trainers</p> <p>_# of households reached</p>	<p>Knowledgeable community trainers committed to increasing awareness of their community</p> <p>Knowledgeable community regarding healthy homes: asthma/allergens lead poisoning prev. mold/moisture integrated pest mgt. energy conservation waste reduction/recycling radon</p>	<p>Increased numbers of families taking action to address health and environmental concerns</p> <p>Increased number of children being tested for lead</p> <p>Increased number of children screened for asthma</p> <p>Increased community participation in health and environmental service programs</p>	<p>Reduced asthma and allergy emergency room visits.</p> <p>Reduced asthma hospitalizations</p> <p>Reduced # of school days missed</p> <p>Reduced # of EBL children</p> <p>Reduced radon exposure</p> <p>Reduced lead hazards in _# homes</p> <p>Reduced allergens in _#homes</p>	<p>Name/Org: Tel: E-mail:</p> <p>EPA Contacts: Althea Moses Heather Duncan Crystal McIntyre Carlin Hafiz Chrissy Wolfersberger</p> <p>Oak Grove Neighborhood Association Oak Park Neighborhood Association El Centro Ruskin Heights Children’s Mercy Hospital Wyandotte County Health Department Kansas City Health Department</p>