EPA-REGION 8 ENVIRONMENTAL JUSTICE ACTION PLAN

2004-2005

ENFORCEMENT, COMPLIANCE AND ENVIRONMENTAL JUSTICE
U.S. ENVIRONMENTAL PROTECTION AGENCY

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http://www.epa.gov/region8/community_resources/ej/ejhome.html

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Executive Summary

The EPA- Region 8 Environmental Justice Program (EJ Program) addresses a unique mix of urban, rural, and tribal issues shaped by the geography, culture and history of our mountain and plains states. The Region's EJ Program has been designed to address Environmental Justice (EJ) issues in a manner responsive to the crosscurrents borne of our setting.

EJ Program staff, along with technical, enforcement, and legal staff, address a wide range of issues. Recent strategic opportunities have included air quality issues, safe drinking water concerns, hazardous waste corrective action, protection of cultural resources, transportation, environmental impact reviews, children's health concerns, and energy development.

EJ Program resources are structured around six main goals:

- Identification of EJ Priority Areas *(Allocation of our resources)*
- Integration of EJ into Region 8 Programs *(Building internal capacity)*
- Administration of EJ Grants *(Community capacity development)*
- External Outreach *(Engaging other organizations to address site and issue-specific challenges)*
- Data Management *(Program tracking and management for internal and external access)*
- Evaluation of Program Effectiveness *(Applying lessons learned)*

In Region 8, EJ issues typically arise due to converging environmental concerns. Additionally, EJ concerns are rarely amenable to resolution by a single entity. Accordingly, the EJ Program focuses limited resources on convening and facilitating multi-media/multi-agency cooperative efforts to address EJ issues. The majority of the activities reported in the EJ Action Plan matrix reflect this approach. In the matrix, we highlight stakeholder partnerships that the EJ Program has initiated to address EJ issues and concerns.

This Action Plan is consistent with and meets the Fiscal Year 2004 OECA (Office of Enforcement and Compliance Assurance) Memorandum of Agreement (MOA) Guidance Update (July 2004).

Appendix A summarizes Region 8's environmental justice priorities for fiscal years 2004 and 2005. As the optics for fiscal year 2005 become clearer, Region 8 will update, amend, and reissue its Action Plan for 2005, as necessary.

Management Accountability

Organizational Infrastructure and Management Support

- The EJ Program was established on August 11, 1994, by Regional Order (Order). The Program was established to achieve equal environmental protection so no segment of the population, regardless of race, ethnicity, culture or income bears an undue burden of environmental pollution and to ensure that the benefits of environmental protection are shared by everyone. The Order establishes the Region 8 environmental justice policy as follows:

  Region 8, the states, Indian tribes and affected communities in Region 8 will work together to correct and prevent inequitable environmental and public health impacts to any groups through effective implementation of policies and procedures that will include the following:

  A. Raising people's awareness of EJ issues;
  B. Identifying, assessing, addressing and responding to inequitable environmental impacts;
  C. Managing procedures that will correct present and prevent future inequitable environmental impacts;
  D. Communicating information to the public regarding opportunities for involvement in environmental decision making.

- The EJ Program Director is a member of the Regional Leadership Team and meets regularly with Senior Program Managers to coordinate activities. The Senior Leadership Team establishes Region-wide direction and goals.

- Evaluation of the Program is conducted both through the annual performance cycle and by assessing the extent and nature of interaction with the Region's media program management and staff. In addition, we evaluate the outcomes of these interactions in terms of benefits to communities.

Operational Resources/Program Support

- The EJ Program is incorporated into the Office of Enforcement, Compliance and Environmental Justice. From this organizational base, the EJ staff works closely with the Regional programs to incorporate EJ activities.

- The EJ Program functions with a staff of 4 Environmental Justice Coordinators (4 FTE), and a part-time secretary (0.5 FTE). The overall leadership of the EJ

Program is performed by the EJ Program Director (1 FTE).

- The Region's Superfund/Emergency Response/ Brownfields program has funded a National Older Worker Career-Senior Environmental Employee (SEE) to be its conduit for environmental justice activities. The SEE employee resides within the Environmental Justice Program and reports directly to the EJ Program Director.

- The overarching responsibility of the EJ Program is to integrate EJ into the Agency's core programs. The EJ Program has chosen to adopt a comprehensive and multifaceted approach. Individual EJ staff assignments are designed to address specific environmental media or core program areas. The assigned staff are responsible for initiating activities, following up on leads, evaluating program vulnerabilities and opportunities, and providing appropriate program support.

- The EJ Program has many projects, which serve as mechanisms for focusing on EJ issues. The EJ Program has developed a protocol, for staff to follow while serving on teams, which focuses on the integration of EJ into core program activities. Each member of the EJ Program works to provide internal advocacy and education to assigned project teams. Each EJ staff person is proactive in enhancing the EJ awareness of the project team members.

- The Environmental Justice Program spends a significant amount of time in attempting to secure resources from other internal EPA programs, which may or may not be able to provide those requested resources. This major effort hampers the EJ Program's ability to timely respond to stakeholder issues and concerns.

GPRA Alignment (link to mission and priorities)

- The EJ Program is linked to the Government Performance and Realignment Act (GPRA) through several venues. Specific activities which meet the Office of Environmental Justice (OEJ) GPRA priorities are reported directly to OEJ. Regional and national initiatives are linked to the national program managers' (NPMs) commitments through memoranda of agreement between the Region and the NPMs. The EJ Program is involved with several national initiatives, including children's health, sensitive populations, RCRA, Air Toxics, Lead Based Paint, Refineries, Brownfields, integrating EJ criteria into inspection targeting, and development of national EJ training.

- The EJ Program strategies and activities are integrated into specific programmatic area/functions through various means. The OECA Memorandum of Agreement (MOA) is one of the ways that the EJ Program integrates EJ into program function areas. RCRA has developed a "Beginning of the Year Plan" a planning document, which specifically incorporates EJ into RCRA core activities.

- EJ is generally incorporated into Performance Partnership Agreements (PPAs), and Performance Partnership Grants (PPGs). Our Regional States include general environmental justice language in their PPAs.

Internal Organizational Engagement

- The EJ Program has developed successful mechanisms to communicate with, receive input from, and otherwise consistently engage other programs in the Regional office. Additionally, the EJ Program publicizes its efforts through presentations at national conferences, public meetings, and through training opportunities.

- Specific tools developed for internal organizational work include: targeting inspections based upon EJ criteria; a Regional EJ Geographical Information System (GIS) application; and specific procedures used to review EJ grant proposals.

- In response to the Office of Environmental Justice's query as to whether the Region 8 Environmental Justice Program will develop any guidance regarding the integration of environmental justice in areas such as: authorization/delegation, inspection, enforcement and compliance assistance, permitting, waste site cleanup/brownfields etc., Region 8 believes that such guidance needs to be developed by the Office of Environmental Justice (HQ) to ensure consistency among the ten Regional offices.

External Stakeholder Engagement

- The EJ Program utilizes several on-going mechanisms to share information with external interested parties. The EJ Program has frequent and meaningful contact with external stakeholders through project specific initiatives, such as the Pueblo County EJ initiative, the Pueblo Army Deport EJ initiative, North Denver Initiative, through development of community-based Supplemental Environmental Project (SEPs) , and the Migrant Farm Worker Drinking Water Project. Through these action specific activities, The EJ Program regularly communicates with community groups, local governments, state agencies and other interested parties. Furthermore:

  - The EJ Program communicates with external stakeholders through an informational bulletin, "Open Doors," which is mailed to approximately 600 individuals and organizations interested in receiving information about EJ. "Open Doors" contains articles of interest to community groups, information about on-going programs, grant availability, and contact

telephone numbers. Occasionally, an entire issue may focus on a relevant topic of interest, such as EJ grant opportunities.

- The EJ Program has developed a website with information about on-going activities. The website also has information on who to contact with specific questions, issues, or concerns. The website address is as follows: http://www.epa.gov/region8/community_resources/ej/ejhome.html

- The EJ Program is developing a database to track environmental justice citizen complaints.

- The EJ Program is in the process of developing a newsletter to reach the large Korean speaking population of Denver, Colorado.

- Then EJ Program is developing informational brochures targeting the large Spanish speaking population in Region 8.

o The EJ Program strives to identify stakeholders who could benefit from increased awareness about EJ. Outreach efforts to identify interested groups and individuals and contacting stakeholders experiencing EJ issues is a significant on-going effort. To reach as many interested parties as possible, the EJ Program reaches out to stakeholders through the medium of "Open Doors," the EJ website, grants training, EJ workshops, other EPA program contacts, networking with other federal and state agencies, presenting at national conferences, serving on panels, and providing information at national and regional meetings. The EJ Program is working with Tribal groups to improve grant proposals and is planning to conduct EJ training in the coming year.

o The EJ Program focuses on initiating multi-stakeholder collaborative processes to address EJ issues. A significant role for the EJ Program in the Regional office is as a convener of Regional programs and outside organizations to address multi-media/multi-agency EJ issues. Examples of such efforts are:

- The EJ Program has accepted cooperating Agency status with the Federal Highway Administration to work on the Environmental Impact Statement (EIS) for the expansion of Interstate 70, which passes through an EJ community.

- The EJ Program is developing a partnership with the State of Colorado, to research and map the locations of children with elevated blood lead levels for targeting and outreach purposes. The outreach information may be

used to move towards formal enforcement, if necessary. The mechanism will be the same as that used to partner with the State of North Dakota.

- As the lead Region tasked with developing an EJ Cultural Resource module for the EJ training, the EJ Program will convene a multi stakeholder group to design the module, which will be used to teach interested parties about the intricacies involved in the preservation of cultural resources.

- The EJ Program schedules quarterly grant conference calls to give grant recipients networking opportunities and to develop partnerships.

- Working with Tribes to develop effective grant writing skills.

o The EJ Program continues to address language issues for persons with limited English proficiency by utilizing Regional staff and stakeholders to assist with language barrier concerns. We have provided translators and equipment for simultaneous translation at SEP development meetings and at community outreach meetings.

o The EJ Program will utilize informational materials translated into the appropriate language and will provide such materials to groups and individuals who attend planned activities such as our "Brownbag Series", which is held at various intervals during the year. Our outreach efforts include several events which target minority populations such as the Migrant Farmworker's Appreciation Day, and the Migrant Farmworker Growers Workshop.

Data Collection, Management, and Evaluation

o The EJ Program maintains an interactive database of more than 600 interested organizations and individuals. The database also serves to track projects, staff assignments, grant activities, and intern projects.

o The EJ Program has worked closely with the enforcement program to identify "potential EJ sites". Prior to screening cases, the EJ Program provides demographics information on each of the potential cases, so that potential EJ sites are identified early in the enforcement process.

o The EJ Program utilizes various methods to promote shared learning, such as:
- Quarterly meetings with all grantees, both EJ Small Grants and EJ Pollution Prevention Grantees.
- Informational meetings with the Regional program offices.

Professional and Organizational Development

- The EJ Program frequently updates the EJ Workshop materials to reflect lessons learned from training experiences and to add updated EJ information. Currently several modules are being updated, including " EJ and the Law," "GIS and EJ," and the case study format.

- One of the methods used to promote shared learning, such as best practices and lessons learned, is by sharing the materials developed for EJ training with OEJ and the EJ Training Collaborative. Our "Open Doors" newsletter is another effective communication mechanism used to share information with interested parties.

Environmental Justice Assessment

- The evaluation of whether the EJ Program should use its limited resources in a specific situation is based on the EJ Deliberative Process. Our deliberative process utilizes demographics, information on disproportionate impact, stakeholder involvement and interest, and a balancing analysis of the benefits and burdens of the proposed action.

  - Demographics: Low-income populations are identified using annual statistical poverty thresholds from the Bureau of the Census; current population reports, Series P-60 on Income and Poverty. Minority populations are identified as members of the following population groups: American Indian or Alaskan Native, Asian, Native Hawaiian and other Pacific Islander, Black or African American, and Hispanic or Latino.

  - Stakeholder involvement: All populations should have a meaningful opportunity to participate in the development of, compliance with, and enforcement of Federal laws, regulations and policies affecting human health or the environment. The EJ Program strives to identify whether or not communities have easy access to public information and the Program strives to provide opportunities for public participation in matters relating to human health and the environment.

  - Disproportionate impacts: the EJ Program determines whether there is or will be an actual or potential disproportionate impact on the natural or physical environment that significantly and adversely affects a minority population, a low-income population, or Indian Tribe. Indicators used to make such determinations may include: ecological, cultural, human health, or economic.

- Benefits and Burdens: the EJ Program determines whether there is unfairness in the distribution of the benefits and the burdens associated with the implementation of Federal laws, regulations, and policies and whether or not all segments of the society regardless of race, color, national origin, or income share fairly in receiving the benefits from environmental protection and in shouldering the burdens of implementation of these policies.

- The EJ Program relies on various informational resources to conduct an EJ assessment. These sources include the Region 8 EJ Geographic Information System application, interviews with key EPA, State, and community parties, file and historical research, and discussions with EPA core programs and OEJ.

Program Evaluation

- The EJ Program will highlight the accomplishments, results, and program evaluations predicated by our EJ Action Plan through region-wide meetings, luncheon presentations, fact sheets, posters, training opportunities, site-specific presentations, meetings, and Regional and national reporting mechanisms.

Appendix A

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 stakeholders 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	Measures
This activity meets OECA's FY 2004 Memorandum of Agreement (MOA) Guidance Update. Assess enforcement & compliance history of the top 10% TRI (Toxic Release Inventory) facilities . Lead Contact: Tami Thomas-Burton	By September 30, 2004, and if necessary move forward into 2005: Assess ethnic & economic make-up of communities in proximity to TRI facilities. Assess enforcement history of TRI facilities located in EJ communities. Assess inspection history at TRI facilities. Coordinate with Enforcement program to develop an enforcement/inspection and outreach strategy to address EJ concerns, if necessary. Final report of TRI facilities located within EJ defined boundaries. Identify TRI non-reporters, late reporters, and chronic late reporters located in EJ communities.	Enhanced public knowledge of TRI facilities in EJ communities. Enhanced knowledge of TRI facilities and their practices in EJ communities. Increased EPA presence in EJ communities located in and around TRI facilities. Enhanced knowledge of compliance history of TRI facilities located in EJ communities. Enhanced knowledge of enforcement actions conducted to address non-compliance of TRI facilities in EJ communities. Education of EJ communities on TRI best practices and available resources. Commitment to communicate with the State on our EJ activities and to add this activity to the PPA/SEA, as appropriate.	Number of facilities identified in EJ communities. Number of facilities identified as non-reporters, late reporters and/or chronic late reporters. Number of documents distributed to EJ community(ies). Number of people protected due to enhanced knowledge of TRI practices (i.e. identification of non-reporters, chronic late reporters). Increased number of audits/inspections at TRI facilities located in EJ communities.

Activity	Output	Outcome	Measures
Objective 1 continued **This activity meets OECA's FY 2004 Memorandum of Agreement (MOA) Guidance Update.** Encourage/facilitate inclusion of Supplemental Environmental Projects (SEPS) in settlements of enforcement actions. (On going activity in 2004 and 2005) Lead Contact: Michael Wenstrom	By September 30, 2004 (and continued into 2005 as necessary) initiate the following SEPs in the EJ community of Pueblo, CO. **Rocky Mtn. Steel Mills SEPs ($432,000)** -		To double the number of SEPs in FY 2004 from the number of SEPs obtained in FY 2003. To obtain the FTE necessary to employ a SEP expert in the EJ Program Office. To initiate a program that will allow the EJ Program to develop, monitor and track SEPs that are issued as part of the enforcement settlement process.
	• **American Lung Association of Colorado** Open Airways for Schools/Asthma 101	• Asthma management and education for children in 200 families.	Reach over 200 asthmatic children and their families and educate them about and manage their condition.
	• **Breathe Better Foundation** Breathe Better Bus	• Lung function tests for children in Pueblo elementary schools.	Number of children and adults educated about air quality and asthma.
	• **County of Pueblo** Children's Lead Project	• Testing for lead in children's blood and testing homes for lead based paint near RMSM.	Number of homes remediated. Number of children protected from lead poisoning.
	• **Parkview Medical Center** Huff and Puff: Children's Asthma Program	• Expand outreach, and ongoing care to help children (over 10 years of age) and adults control their asthma.	Number of children and adults educated about air quality and asthma.

Activity	Output	Outcome	Measures
Objective 1 continued Encourage/facilitate inclusion of Supplemental Environmental Projects in settlements of enforcement actions.	**-Continued-** **Pueblo Community Health Center** Uninsured Asthma Patients Medical Costs	• Pay for asthma care for 400 patients for one year.	Number of patients treated, under this program, by the Pueblo Community Health Center.
	• **Pueblo Planning and Development Dept.** Habitat improvements at Runyon Lake State Wildlife Area	• Environmental restoration at Runyon Lake State Park and adjacent Arkansas River.	Number of trees planted. Reduce the number of invasive plants that are displacing native riparian plants in the Arkansas River and its floodplains.
	• **St. Mary Corwin Medical Center** GOOD*Medicine* Program	• Respiratory health workshops and free twice monthly health screenings.	Number of workshops held.
	Bessemer Neighborhood Partnership Neighborhood physical improvements	• Removing and covering potentially hazardous materials and educating the neighborhood re: env. hazards.	Number of home yards converted to Xeriscape and number of people educated on water conservation methods.
	Citizens for Clean Air and Water Study of hazardous substance deposits	• Educating citizens about site-specific environmental hazards.	Number of people educated on environmental hazards.
	<u>Farm Worker Protection Standard Settlements</u> • Proposed list of SEPS to be included in pesticide-related settlement negotiations with growers.	• Negotiations in process - proposed improvements in on-site drinking water sources.	Double number of SEPs, from FY 2003, from the Worker Protection Standard enforcement actions.

Activity	Output	Outcome	Measures
Objective 1 continued **This is a geographic initiative, which meets the OECA, MOA FY 2004 guidance.** Reduce risk of exposure to environmental hazards to the Region's migrant farm worker population by conducting Worker Protection Standard inspections. Contact Lead: Michael Wenstrom	Education of workers and families re: potential hazards of drinking water from camp-based wells. Design, install and test low-cost water treatment units on camp wellheads. Produce and distribute information advising farm workers about how to respond to a chemical emergency at Pueblo Chemical Depot.	Reduced exposure of workers at risk from drinking nitrate-laden water (exceedance of maximum contaminant level-MCL). Education of migrant farm workers which will allow them to understand the potential environmental hazards of exposure to pesticides. Education of farm owners about the need to provide a clean, safe water supply to migrant farm workers.	Number of migrant farm workers protected from drinking contaminated water. Number of farm workers protected from increased compliance with FIFRA's Worker Protections Standards.
Conduct Assessment of Superfund sites in EJ areas Contact Lead: Ken Cotton	Determine clean-up status of Superfund Region 8 sites located in EJ areas and compare to clean-up status of sites in non-EJ areas	Enhanced public knowledge of clean-up activities in EJ areas. Increased EPA presence in EJ communities.	Number of people protected from increased clean-up activities. Number of contaminants reduced as a result of cleanup actions in EJ areas.
Assess Brownfields sites and integrate EJ into Brownfields decision making processes. Contact Lead: Ken Cotton	Review Brownfields grant applications to ensure that EJ communities are adequately represented.	Enhanced public participation in the Brownfields process. Enhanced EPA-EJ presence.	Number of Brownfield grants that incorporate EJ principles. Number of grants awarded to EJ communities.

Activity	Output	Outcome	Measure
Regional Geographic Initiative. This activity meets OECA's FY 2004 Memorandum of Agreement (MOA) Guidance Update. Conduct a multi-media toxics reduction project in Northeast Denver Contact Lead: Karen Kellen Contact Lead for Anti-Idling Initiative: Tami Thomas-Burton	Initiate Anti-Idling project in Northeast Denver. Development of brochures and fact sheets to educate drivers and truck companies of Denver's anti-idling law. Improve communication among partner organizations and the communities to address environmental and human health concerns through compliance assistance, enforcement authorities, pollution prevention, and voluntary programs. Conduct air sampling in the Northeast Denver community. Conduct air toxics modeling. Establish community workgroups to explore options to address possible mechanisms and/or initiatives needed to address air toxics reductions.	Enhanced knowledge of truck drivers and truck stop owners of Denver's Anti-Idling law. Enhance knowledge of truck drivers and truck stop owners on the negative health effects from diesel pollution. Reduction in diesel truck exhaust emissions. Reduction in exposure to toxics. Increased EPA presence. Secure funding to conduct air sampling for air toxics in this EJ community. Secure funding to contract for the services of facilitators to guide the community workgroups. Secure funding to update the Denver Department of Environmental Health's baseline modeling assessment to ensure that we are using the latest data to model and monitor the potential impacts of air toxics to the community. Furthermore, by updating the model assessments EPA will be able to more accurately and precisely determine which neighborhoods are suffering from a disproportionate impact from air toxics.	Number of enforcement actions issued by City and County of Denver to violators of its Idling Ordinance. Number of information brochures (compliance assistance) provided to diesel truck drivers and to owners or operators of truck stops. Number of people protected by decreasing the tonnage of air toxics in the atmosphere. Number of workgroups and people formed to address pollution reductions in Northeast Denver.

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

Activity	Output	Outcome	Measures
This activity meets OECA's FY 2004 MOA Guidance Update. Educate EJ communities on the dangers of lead based paint. Conduct Section 1018 inspections and enforcement. Contact Lead: Nancy Reish	By September 30, 2004, identify EJ communities in Colorado that may be disproportionately impacted from lead based paint. Be September 30, 2005, identify EJ communities in Utah that may be disproportionately impacted from lead based paint. The EJ Program and the Lead Enforcement Program will coordinate and target Section 1018 compliance assistance and enforcement activities to ensure EJ areas are environmentally protected.	Enhanced public knowledge of the dangers of lead based paint. Reduction of blood lead levels in Children. Increased compliance with Section 1018 of the lead rules (TSCA).	EJ communities where children's blood lead levels are found to be high, are mapped using GIS/Arcview. Number of educational packets (compliance assistance) distributed to communities identified as having children with high blood lead levels. Number of inspections in EJ communities.
This activity meets OECA's FY 2004 MOA Guidance Update. Geographic EJ initiative in Korean community in Denver, CO. Contact Lead: Hans Lee.	Development of Korean language brochure that will provide information to the Korean community-at-large about Regional environmental justice activities. Publish EJ available tools in Korean language newspapers. Complete report on efforts by December 31, 2003.	Increase EJ presence in the Denver-Korean community. Enhanced knowledge of EPA's program's by the Korean community.	Number of brochures distributed. Number of newspaper columns published. Number of outreach materials translated from English to Korean.

Activity	Output	Outcome	Measures
Establish and maintain an EJ website. Contact Lead: EJ Program	Update EJ website, as needed.	Public access to information on EJ issues is enhanced.	Number of "hits" to the EJ website.
Establish an EJ inquiry and complaint tracking system. Contact Lead: EJ Program	By Sept. 30, 2004, the EJ Program will have developed and will implement a database to track Regional EJ complaints	Increase awareness of and response to all significant EJ issues impacting EJ communities in Region 8.	Number of EJ complaints tracked.
Objective 2 continued OPENDOORS Newsletter	Prepare and distribute newsletter to EJ stakeholders. The newsletter will be distributed bi-annually.	Increased knowledge and awareness of Region 8's EJ Program activities.	Number of stakeholders served by the newsletter. Number of mailings of newsletter.

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

Activity	**Output**	**Outcome**	**Measures**
Conduct EJ Training Contact Lead: Tami Thomas-Burton	By September 30, 2005, the EJ Program will have trained 90% of the Region 8 employees on environmental justice and how to incorporate EJ into the decision making process.	Enhanced Regional knowledge of EJ issues/concerns/trends. Knowledge of EJ to integrate in day-to-day activities.	Number of employees trained. Number of managers trained. Increased number of decisions take into consideration EJ principles.
EJ grants training Contact Lead: Nancy Reish Jean Belille	By September 30, 2004, the Region will have conducted two EJ grant training workshops and trained over 30 interested parties. By September 30, 2005, the Region will have conducted two EJ grant training workshops and trained over 30 interested parties.	Enhanced public knowledge of the grant writing process. EJ communities will be better prepared to effectively compete for EJ grants. Enhanced EJ community participation in the grants awarding process. Enhanced EPA presence in EJ communities.	Number of stakeholders trained. Number of EJ grant applications. Number of EJ projects initiated by communities as a result of grant award.
Risk Assessment and EJ Training Contact Lead: Karen Kellen	By September 2004 provide basics of risk assessment and cumulative impacts on EJ communities for multi-media toxics project communities.	Enhanced understanding of risk assessments. Improved decision making by informed community/industry groups .	Number of stakeholders trained.

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.

Activity	**Output**	**Outcome**	**Measures**
Initiate a blood lead level education and outreach program on Tribal lands. Contact Lead: Jean Belille	By September 30, 2004, the EJ Program will have completed a lead based paint education and outreach program for Tribal Nations in Region 8.	Outreach and education of EJ communities on the health effects of exposure to lead based paint. Reduction of blood lead levels in children.	EJ communities where children's blood lead levels are found to be high, are mapped using GIS/Arcview. Number of educational packets (compliance assistance) distributed to communities identified as having children with high blood lead levels.
Coordination with the Region's and State's permitting programs to integrate environmental justice into the permitting process. Contact Lead: Jean Belille.	By September 30, 2004 the EJ program will have finalized a checklist that could be used by the permitting programs to incorporate EJ into the permitting process.	Permits will reflect that the permitting authority considered EJ concerns in the decision making process.	Final EJ-Permitting checklist completed and approved.

Activity	Output	Outcome	Measures
Objective 4 continued Review and comment of NEPA submittals. Contact Lead: Jean Belille for Tribal Lands Tami Thomas-Burton (all others)	Comments ensuring that EJ concerns have been integrated into the EIS and EA's.	Protection of EJ communities from negative environmental impacts in areas impacted by federal projects.	Number of NEPA actions in which EJ concerns were considered in the finalization of EIS's and/or EA's.
This activity meets OECA's FY 2004 MOA Guidance Update. Geographic initiative: Facilitate Regional involvement in a community-wide smart growth/sustainable development project in Pueblo, CO.	Beginning in September of 2003, EJ will convene a series of meetings between agency staff and (1) local government stakeholders and (2) community members. These meetings will continue over the next two years and are designed to explore Agency resources which might be applied to a long-term community-wide sustainable development process.	Application of appropriate agency resources to the community effort. Initially, this will involve community engagement with the Brownfields program, review of possible grant programs which can assist in this effort and initiation of a dialogue with neighborhood groups, local and state government and the business community about how best to apply the principles of smart growth/sustainable development in Pueblo.	Number of stakeholder involvement meetings held. Number of Brownfields grants awarded. Formation of local and state government, neighborhood groups, and businesses to develop strategies to implement smart growth/sustainable development. Development of strategies to initiate a sustainable development initiative.

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.

Activity	Output	Outcome	Measures
Continue the EJ small grants program in 2004 and 2005. Contact Lead: Nancy Reish	Awarding of EJ small grants. Host quarterly conference calls with grantees. Conduct post award monitoring of grants. Track and report EJ grants activities. By September 30, 2004, the Region will award five (5) grants to five community groups to address Superfund concerns. Three of the grants will be awarded in Colorado and two in Utah. By September 30, 2004, the Region will award four (4) grants to community groups to address non-Superfund concerns, in the states of Wyoming, South Dakota, Colorado, and Utah. Projecting to issue EJ grants in 2005 at the same or higher rate than in 2004, depending on available resources.	Increased public involvement in the decision making process. Increased public knowledge of human health and environmental concerns. Increased public knowledge of the Superfund processes. Increased EPA presence in EJ communities. Independent assessment of community environmental conditions.	Number of EJ small grants awarded. Number of grants to EJ communities located near Superfund sites.

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

Activity	**Output**	**Outcome**	**Measures**
Participate in the Legal Enforcement's case screening committee to assess potential enforcement outcomes to EJ communities. Attendance at case screening: EJ Director.	Analyze and track enforcement activities to determine EJ enforcement trends. Participate in the development of potential Supplemental Environmental Projects (SEPs) for EJ communities.	Enforcement, if appropriate, in EJ areas, including Tribal lands. Community based SEPs.	Increase number of SEPs in EJ communities. Number of enforcement actions in EJ communities.
Integration of EJ into SEPs. Contact Lead: Jean Belille	By December 31, 2003, completion of SEP report that will summarize the number of SEPs that have been conducted in EJ areas and non-EJ areas.	Integration of the SEP process into EJ considerations, which may enhance communities involvement with the SEP process.	Completion of SEP report. Identification of trends, if any (i.e., more SEPs in non-EJ areas than in EJ areas). Provide and brief the Technical Enforcement Directors on report findings and on efforts to increase SEPs in EJ areas.
Integration of EJ into the energy development process. Contact Lead: Jean Belille	Review and comment on NEPA documents submitted as part of energy development projects. Attend, participate and be an active member of the Tribal Coal Bed Methane workgroups and/or meetings.	Enhanced EJ community participation in the NEPA-energy development process. Ensure that EJ concerns are being addressed by the energy development processes.	Integration of EJ principles into the energy development decision making process.