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# Phase One Report

## Superfund Remediation and Redevelopment for Environmental Justice Communities

February 2020

National Environmental Justice Advisory Council  
Superfund Working Group

*A Federal Advisory Committee to the  
U.S. Environmental Protection Agency*

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# Acknowledgements

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The National Environmental Justice Advisory Council (NEJAC) acknowledges the efforts of the NEJAC Superfund Working Group in preparing this Phase One report, and the leadership of Charlie Chase, Michael Tilchin, and Kelly Wright, who serve as co-chairs of the Working Group. In addition, the Working Group's efforts were supported by the U.S. Environmental Protection Agency (EPA) staff, notably, Andrea Bain, Lena Kim, Suzi Ruhl, and Audrie Washington.

# Disclaimer

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This report of recommendations has been written as part of the activities of the NEJAC Superfund Working Group. NEJAC is a public advisory committee providing independent advice and recommendations on the issue of environmental justice to the Administrator of the EPA. In addition, the materials, opinions, findings, recommendations, and conclusions expressed herein, and in any study or other source referenced herein, should not be construed as adopted or endorsed by any organization with which any Working Group member is affiliated. This Phase One report has not been reviewed for approval by the full NEJAC membership, and hence, its contents and recommendations are preliminary and draft and do not represent the final opinion or recommendations of the full NEJAC.

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## 1. NEJAC Working Group, Vision for EPA's Superfund Program

*EPA's Superfund program more effectively fulfills its core mission of protecting human health and the environment by also serving as a change agent driving community engagement and asset creation. The foundation for success in this enhanced mission is to establish a community driven end-state vision early on and throughout the Superfund process, from planning to remediation to reuse/redevelopment. EPA Superfund program action to achieve this vision extends to decision-making, guidance, training, community support through technical assistance and financial resources, and adaptive, innovative programming.*

## 2. Top Priorities for Achievement

Building from the Working Group's vision, the following actions were selected for immediate attention:

**ACTION 1:** Align impacted community end-state vision for the site throughout the EPA Superfund and contaminated site pipeline activity, including planning, remediation and reuse, on decision-making, training, and impacted community support/capacity building.

**Explanation:** EPA policy should connect the site end-state vision to the remediation effort, including development of long-term stewardship, and support community-driven planning for future use as an essential, routine, early and continuous step in the Superfund pipeline process.

**Implementation Activities:** Activities by EPA to accomplish this recommendation include:

- Develop and issue revised guidance on remedy enhancement and betterment, as an update to OSWER Directive 9200.3-110.
- Develop and issue community engagement decision-making guidance.
- Increase support for reuse planning through technical assistance and funding resources for impacted population engagement. This includes broadening the scope of activities eligible for funding, with eligibility criteria designed to enhance a community's ability to engage in redevelopment visioning and planning.
- Recognize and reward Remedial Project Managers (RPMs) who successfully integrate/create community assets in the cleanup process.
- Foster alignment, consistency and sharing of lessons learned across EPA programs addressing contaminated site planning, remediation and reuse.

**ACTION 2:** Conduct effective, efficient, and consistent community engagement throughout the Superfund and contaminated site pipeline activities.

**Explanation:** EPA should strengthen cross agency practice to provide the impacted community with the knowledge foundation to productively engage in decision-making throughout the lifecycle of the Superfund process from site remediation through reuse, including long term stewardship

**Implementation Activities:** Activities by EPA to accomplish this recommendation include:

- Build on important Community Involvement Coordinator (CIC) programming, supported by the Office of Environmental Justice (OEJ).
- Develop training programs with consistent content and effective delivery strategies, both internally for EPA (for EPA Remedial Project Managers and CICs, as well as other EPA staff who engage directly with communities) and externally for impacted communities.
- Increase resources for community engagement and risk communication through cooperative agreements, grants and other funding mechanisms.
- Adopt a concentric circle approach to community engagement.
- Develop program level guidance for community engagement.

### 3. Background and Purpose

In 2018, the National Environmental Justice Advisory Council (NEJAC) received a charge (Appendix A) from the EPA Superfund Task Force to help integrate environmental justice into the cleanup and redevelopment of Superfund and other contaminated sites. To address this charge, NEJAC established the Superfund Working Group (hereinafter referred to as Working Group), comprised of 30 members from diverse backgrounds in academia, financial, legal, brownfields, remediation, federal, state, local and tribal government, and community-based organizations (Appendix B). During Phase One the Working Group addressed charge questions one and two regarding community engagement in decision making and integrating remediation and reuse, including risk communication and long-term stewardship. This iterative, adaptive report is the Phase One deliverable in fulfillment of the NEJAC's charge from EPA. During Phase Two, the Working Group will address charge questions three, four and five regarding case studies, additional resources to support reuse and redevelopment, and identification of additional issues related to cleanup and redevelopment. The recommendations will be further explored and refined during Phase Two and be presented to the full NEJAC for final approval in 2020.

### 4. Key Findings: Guiding Principles, Actionable Recommendations and Promising Themes

Throughout the deliberative process, the Working Group identified guiding principles (Appendix C) that informed the development of actionable recommendations (Appendix D). Overarching themes distilled from the guiding principles and recommendations are:

- **Remediation and Redevelopment:** Success is best achieved when both remediation and reuse/ redevelopment efforts align with the impacted community's vision. Early in the cleanup process – at the planning stage – EPA should engage the impacted community in establishing an end-state vision for the site, which includes both remediation and possible redevelopment (i.e. residential, commercial, or green space/recreational).

- **Community concerns, challenges and opportunities:** The greatest opportunities to strengthen EPA’s risk communication and community engagement efforts stem from consistently engaging impacted communities at the beginning of the cleanup process – at the planning stage – with the early engagement effort devoted to listening to and seeking to genuinely understand community concerns. EPA’s risk communication efforts should recognize that these concerns not only need to be heard but *also responded to* in planning, cleanup and reuse/redevelopment of contaminated sites. Further, the full extent of relevant community concerns, even if beyond the limits of Superfund, should also be recognized.
- **EPA Superfund Role:** EPA should expand the “self-image” of Superfund to incorporate as a core trait its role as change agent/facilitator to engage communities in site redevelopment and work collaboratively with partners to protect human health and the environment, create community assets, and foster long-term stewardship.
- **Consistency:** More consistent application of community involvement best practices and contaminated site policies will help build community trust and lead to a higher level and more sustained community participation. EPA should apply consistent policies and best practices for all contaminated sites, including Superfund, RCRA, Brownfields and UST. This consistency should be maintained across programs and Regions.
- **Strengthen community voice in decision-making:** Expanding access to information and supporting community engagement in decision-making will level the playing field and foster community consensus, especially at active sites where changing conditions are the norm. EPA should support community engagement policies and practices with sufficient technical and financial resources.

## 5. Methods for Engagement and Decision-Making

A driving force of the Working Group is catalyzing action that produces measurable results for impacted communities. Thus, they applied both qualitative and quantitative methods to derive recommendations that are reinforced with key observations and guiding principles. Qualitatively, facilitated dialogues were convened to glean from the combined expertise of working group members. A day long in-person meeting was held on April 29, 2019 which built upon a series of smaller group meetings held over the course of several months (Appendix E).

Based on its commitment to action, the Working Group developed a robust and diverse menu of methods that EPA can apply to achieve multiple objectives and implement recommendations. These methods and the prioritization by members are: produce guidance, memoranda and other policy documents; increase resources for technical assistance and funding for community engagement; update and develop additional training curriculum for internal and external audiences; create an innovation incubator; conduct rapid and regular health impact assessments, establish and maintain a case study repository; designate ombudspersons; create, expand and regularly update websites; establish and promote communities of practice for sharing best practices among RPMs dealing with similar types of sites, challenges and opportunities; develop tools for sharing information on lessons learned and best practices; promote technology innovation and adaptive management; and conduct market studies at sites with redevelopment potential.

## 6. 2020 Activities and Next Steps

The Working Group will continue progress and momentum garnered during Phase One by responding to Phase Two questions and through the following Phase Two activities:

- Monitor implementation of recommendations, conduct site visits, and deliberate to adapt its recommendations during the second and ongoing phase of its work.
- Engage additional state, local and tribal government community leaders, technical and legal experts, and others.
- Develop a case study repository, which will include examples of best practices and lessons learned for recommendations offered.
- Identify government and non-government resources that advance community revitalization.
- Contaminated site remediation and redevelopment will be included as a standing item at NEJAC meetings.
- OEJ will continue to engage with the implementation of OLEM's Risk Communication and Long-Term Stewardship Action Plan and performance measures implementation
- The NEJAC will engage with OLEM at a future in-person meeting after completion of Phase 2 to discuss immediate and future implementation of NEJAC's recommendations.
- Produce final report for deliberation, revision and approval by the NEJAC.

## 7. Conclusions

The NEJAC Superfund Working Group has successfully completed Phase One of its charge through this report. The Phase One accomplishments provide the foundation for Phase Two, through which recommendations will be further developed and all five charge questions answered. Areas of focus for Phase Two include developing case studies and models that illustrate best practices and lessons learned; identifying additional resources to support reuse and redevelopment of remediated Superfund sites that can be leveraged through continued engagement and dialogue with diverse stakeholders; and, identifying additional issues related to the clean-up and redevelopment of Superfund sites that have not been addressed. Altogether, EPA intends to integrate EJ considerations into site cleanup and redevelopment by collaborating with NEJAC to include a diversity of voices in driving the best outcomes for underserved and vulnerable communities.

## APPENDIX A

### Charge to the National Environmental Justice Advisory Council on Superfund Remediation and Redevelopment for EJ Communities

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#### BACKGROUND:

The National Environmental Justice Advisory Council (NEJAC) has been at the forefront of contaminated site cleanup and redevelopment initiatives since its founding. In 1995, the EPA and NEJAC co-sponsored a series of dialogues across the country that provided an opportunity for environmental justice advocates and residents of impacted communities to provide input on revitalization of abandoned properties called “brownfields.” In December of 1996, NEJAC finalized an extensive set of advice and recommendations for EPA to consider titled *Environmental Justice, Urban Revitalization, and Brownfields: The Search for Authentic Signs of Hope*. A consistent theme throughout the recommendations was the importance of seeking and including communities in decisions and planning.

Taking these recommendations into consideration, EPA took numerous actions to improve its brownfields initiative. For example, EPA agreed to create a Brownfields Job Training Grants Program targeted toward residents living close to Brownfield sites. EPA initiated brownfields pilots with the U.S. Department of Health and Human Services to focus on an assessment of health risks associated with revitalizing brownfields sites. The NEJAC recommendations also led to the creation of the EPA National Brownfields Conference and the Brownfields Showcase Communities.

After a decade of brownfields program implementation, it became apparent to environmental justice leaders and many others that the clean-up and redevelopment of contaminated sites could just as easily lead to the gentrification of neighborhoods and displacement of local populations as it could to local revitalization. The NEJAC thus made substantive recommendations relevant to these issues with a follow-on report in 2006 titled *Unintended Impacts of Redevelopment and Revitalization Efforts in Five Environmental Justice Communities*. In addition, several other NEJAC recommendations have provided major contributions to EPA’s thinking and policy development around contamination, local impacts, and community revitalization. These include multiple iterations of recommendations on meaningful public participation and involvement in regulatory processes, a 2004 report *Environmental Justice and Federal Facilities: Recommendations for Improving Stakeholder Relations Between Federal Facilities and Environmental Justice Communities*, and more recently in 2015 with *Recommendations for Promoting Community Resilience in Environmental Justice Industrial Waterfront Areas*.

With its long history of involvement in EPA’s implementation of regulatory programs focused on contamination and contaminated sites, it is natural that EPA’s current focus on the Superfund program should include the creation of a charge for the NEJAC. Recommendations from the 2017 EPA Superfund Task Force (SFTF) Report address expediting cleanups; reducing financial burden on parties; encouraging private investment; promoting redevelopment/revitalization; and building/strengthening partnerships. The 2018 update to the Task Force’s Recommendation Number 42 pinpoints cleanup and redevelopment of sites through integration of environmental justice and directs the creation of a charge to the NEJAC for development of recommendations that speak to these issues.

***RECOMMENDATION 42: Use a Federal Advisory Committee to Work with a Broad Array of Stakeholders to Identify Barriers and Opportunities Related to Cleanup and Reuse of Superfund Sites***

*The NEJAC will undertake the task of preparing a report of formal consensus advice and recommendations related to long-term stewardship and risk communication at Superfund sites. Additional stakeholder and partner engagement processes will be used to seek feedback from targeted stakeholders, including engaging other EPA federal advisory committees to inform them about what EPA is doing. In addition to using this mechanism to elicit individual feedback from advisory committee members, consideration is being given (in accordance with FACA obligations to hold open meetings) to seek additional stakeholder and partner input related to long-term stewardship and risk communication at Superfund sites.*

This recommendation from the SFTF Report and the following charge to the NEAJC provide an opportunity to continue the momentum of NEJAC's involvement in this sphere of EPA's regulatory and policy work and help shape outcomes for the next generation of Superfund cleanup and reuse.

It is important to note that the NEJAC's efforts will not be carried out in a vacuum. There are in fact at least two other recommendations in the SFTF second year report which are relevant and have significant overlap with the charge for the NEJAC. Specifically, recommendation 40 on development of a communications strategy which will largely take on the issue of advancing EPA's ability to effectively communicate risk, and recommendation 39 which contains several elements of communication, community revitalization, and local stakeholder engagement and collaboration, provide opportunities for the work of the NEJAC to align and provide synergy with other EPA efforts related to the SFTF.

**Overall goal of this charge:**

EPA is committed to continually improving our ability to achieve clean-ups of Superfund sites more quickly and with better outcomes for local communities while maintaining our focus on protecting human health and the environment. The overall goal of this charge is to provide recommendations to the EPA Administrator that will identify barriers, solutions, and best practices to achieve this above goal in a manner that takes central consideration of the unique burdens and vulnerabilities of environmental justice populations living in and around superfund sites. The recommendations produced should not be overly focused on the immediate activities of the superfund program but instead look out five to ten years into the future and describe a horizon that the Superfund program can aspire to achieve through the adoption of NEJAC's recommendations over time. The recommendations should account for the importance of the intersection between remediation and redevelopment. And the recommendations should also everywhere include consideration of improving EPA's ability to effectively communicate risk to local communities and other stakeholders.

As outlined in the SFTF Report recommendations, the EPA reaffirms the Agency's commitment to incorporating advice and recommendations from the NEJAC to determine best approaches to integrating environmental justice considerations and the perspectives of multiple stakeholders into cleanup and redevelopment of sites. The EPA intends to integrate EJ considerations into site cleanup and redevelopment by collaborating with NEJAC to include a diversity of voices in driving the best outcomes for underserved and vulnerable communities.

## Charge Questions

Specifically, the EPA requests that the NEJAC consider the following issues related to cleanup and redevelopment of Superfund sites to provide feedback on barriers and opportunities:

### Phase 1: Completed by June 1, 2019

1. What are specific ways in which the NEJAC, EPA, and other relevant stakeholders can facilitate strong, strategic relationships with stakeholders to facilitate effective cleanups and site reuse, and equitable decision-making throughout the entire SF process? How can NEJAC and EPA most effectively and efficiently identify EJ stakeholders and their interests, capacity and needs (community education, engagement, and capacity building) and ensure that interests and needs are considered in redevelopment planning and implementation processes?

- a. Who are the impacted populations?
- b. What are best practices and important considerations to achieve meaningful engagement and fair treatment when there are different impacted communities and disparities exist between those communities?
- c. What are methods and innovations for community capacity building?
- d. Are there other essential services and needs providers (e.g. health care, healthy food, recreation)?
- e. What are specific ways in which all communities can be encouraged to move from passive stakeholders to active partners?
- f. Are there additional/unique educational needs related to the technical aspects of clean up and redevelopment?
- g. What do equitable cleanups of Superfund sites look like to EJ stakeholders?

2. What does NEJAC believe should be done to facilitate effective, efficient, and consistent decision-making regarding remediation and redevelopment of NPL sites? How can EPA better ensure that all parts of the community – especially vulnerable, overburdened, and underserved populations – are able to meaningfully engage in every phase of the Superfund process and have the information they need to understand the data and issues? How can EPA more clearly communicate the risks at sites and ensure that concerns and knowledge from all parts of the community are being heard and considered in remediation and redevelopment decision-making? Please consider these questions relevant to the following major items/areas within the Superfund process:

- a. Remediation Approaches, especially Institutional and Engineering Controls: assumptions, considering cumulative impacts, community awareness of requirements, etc.;
- b. Long Term Stewardship: notice of ICs, maintenance of ICs over time, adapting operation and maintenance plans, etc.;
- c. Risk Communication and Community Engagement: cultural and linguistic differences, learning strategies, access, and availability of current site-related information, etc.;
- d. Barriers and Opportunities for community participation in the Remedial Process (Discovery to Deletion), and ensuring that EJ stakeholder interests and needs are considered in redevelopment planning and implementation;
- e. How can EPA be more proactive in avoiding the creation of Superfund sites in the first place?

## **Phase 2: Completed by March 30, 2020**

3. Can the NEJAC provide examples of case studies and models – Superfund and non-Superfund alike – that illustrate best practices and lessons learned (cleanup, redevelopment, risk communication, federal initiatives) which can inform ways to elevate equity in Superfund cleanup and redevelopment, to ensure all have a voice in EPA decisions? How has the EPA Superfund Task Force’s plan and recommendations advanced contaminated site remediation and redevelopment in vulnerable, overburdened, and underserved communities?
  - a. Are there certain practices and tools (e.g. Health Impact Assessments) that are especially effective in facilitating relationships with all stakeholders?
  - b. How can EPA best implement the Superfund Redevelopment Initiative? Are there certain practices and tools that can be improved as part of this process?
  - c. Are there certain practices and tools from other waste media programs (e.g. wastewater management) that have been effective?
  - d. Are there retrospective and/or prospective case studies that best illustrate the barriers and opportunities?
4. Which additional resources (e.g. water infrastructure investment, job creation) can be realized to support reuse and redevelopment of remediated Superfund sites from other sources? Specifically, resources including but not limited to:
  - a. Federal, Tribal, state, and local agencies;
  - b. Private sector/third party investors.
5. Does the NEJAC propose any additional issues related to the clean-up and redevelopment of Superfund sites that are not captured in the questions above? Does the NEJAC identify any issues related to the implementation of the SFTF Plan and Recommendations?
  - a. Legacy contamination that impacts multiple generations
  - b. Disposal of contaminated materials

## APPENDIX B

### NEJAC Superfund Working Group Members\*

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Rosann Albright  
Andrea Bain  
Miles Ballogg  
*Charlie Chase*  
*Jabari O. Edwards*  
Daniel B. French  
*Jan Marie Fritz*  
Susan Hanson  
*Rita Harris*  
Declan Hayes  
Charles Howland  
Lena Kim Adams  
Jason Lichtstein  
Angelo Logan  
Ellen Manges  
Karen Martin  
*Melissa McGee-Collier*  
*Sylvia Orduno*  
John Petitjean  
Suzi Ruhl  
*Karen Sprayberry*  
Matthew Tejada  
David Templeton  
*Michael Tilchin*  
*Hermila Trevino-Sauceda*  
Audrie Washington  
*Sandra Whitehead*  
*Sacoby Wilson*  
*Kelly C. Wright*  
*Dewey F. Youngerman*

\*NEJAC Members shown in *italics*

## APPENDIX C

### Guiding Principles for Advancing Environmental Justice through Superfund Remediation and Redevelopment

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1. What communities are worried about may not be what the SF program seemingly shows up to address.
2. The Superfund program needs to be clear about the limits of its authorities and resources in its interactions with affected communities and recognize and identify the support and assistance that may be needed beyond what Superfund might be addressing. At the same time, the Superfund program should recognize [the possibility] that the statute already authorizes a degree of community engagement and assistance beyond its current practices, and that it should expand the aperture of the issues it can and should take on, within the scope of the statute.
3. The Superfund program and EPA must focus on developing and maintaining trust earlier in the investigation process, and throughout the feasibility study, design, and construction processes.
4. Superfund must assure there is equitable community engagement and reach out to the most marginalized communities and stakeholders, especially those not already represented by identified leaders or groups.
5. The Superfund program must assist impacted communities in understanding the legal aspect of what is proposed and occurring on a site, including what is meant by “clean”, the techniques used to achieve that goal, and who will be involved in conducting the actions to achieve that goals, i.e., EPA, state, PRPs (government and private).
6. The Superfund program must use best practices and seek innovative solutions to achieve the results best tailored to particular Superfund projects and impacted communities.
7. The Superfund program must at least identify, and where appropriate, incorporate the community’s end-use wants and needs during the FS stage, i.e. before the Proposed Plan is issued. As the remedial alternatives are being developed, there should be a discussion about what categories of reuse are economically and technologically feasible as part of ongoing, required community outreach. Within those potential end-uses, Superfund should engage the community to find the community’s wants and needs for the property and include remedial alternatives that support that reuse.
8. A transformational vision for Superfund is that today EPA can best carry out Congress’s intent for addressing contaminated land (as reflected in the original statute as well as each of the subsequent amendments up to and including the 2018 BUILD Act) by recognizing that it can and should serve as a change agent/facilitator for community engagement, renewal, and asset creation as part of the program’s core role of protection of human health and the environment. In short, and for example, a remedy that accords with, and is enthusiastically embraced by, a community is one that is more likely to remain permanently protective over the years, and require less future involvement by EPA.

## APPENDIX D

### Actionable Recommendations

1	Intensify community engagement by building on existing Community Involvement Coordinator processes through additional training, including a focus on integrating EJ tenets into their work. Listen and understand community concerns and engage them in early planning and throughout the cleanup process as a consistent practice for all contaminated site programs.
2	Provide impacted community and populations with knowledge foundation, develop a training curriculum and delivery strategy to enhance effective engagement in the decision-making process.
3	Increase community engagement resources to strengthen risk communication practices.
4	Develop program-level engagement guidance to increase impacted population involvement in decision-making.
5	Define and connect end-state vision and end use to the remediation effort.
6	Adopt a centric/concentric circle approach and develop a broad partner roster to engage stakeholders inspired by the impacted community's vision.
7	Improve community access to information and amplify community voices in decision-making through an ombudsperson.
8	Apply Superfund policies and promote best practices consistently throughout processes.
9	Update EPA's Superfund website more frequently and consistently.
10	Promote remedial technology innovation.
11	Establish and maintain a Case Study Repository with structured data collection.
12	Develop and implement a remediation and redevelopment innovation incubator.
13	Act as a change agent/facilitator to engage communities and create assets that will protect human health and the environment.
14	Increase support for reuse planning technical assistance and funding resources for impacted population engagement.
15	Explore community-driven Health Impact Assessments (HIA) as needs assessment and business planning tool.
16	Conduct inclusive market studies early in the process.

## APPENDIX E

### April 29, 2019 Working Group Meeting Agenda

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#### **Purpose**

- Come together as a full workgroup to share highlights of each subgroup's work up to this point;
- Use this pre-work as a catalyst to develop new ideas that challenge old ways of doing things;
- Curate an over-arching set of Guiding Principles, Recommendations, and boundary-pushing challenge areas for a final report to propose to OLEM.

#### **Goals**

- Identify new ideas and approaches to Superfund remediation and redevelopment for EJ communities that will be incorporated in the Working Group's recommendations; and
- Reach a decision on recommendations for the NEJAC Working Group report for the Superfund Task force.

#### **Facilitator**

Gina Cerasani, EPA, Conflict Prevention and Resolution Center

### MORNING SESSION

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#### **8:15 am Meet and Greet (45 minutes)**

Review sub-group proposals posted on the walls

Enjoy complimentary continental breakfast - *sliced seasonal fruit, assorted muffins, freshly baked croissants, coffee and herbal tea selection*

#### **9:00 am Opening Session (30 minutes)**

Meeting Roadmap, Gina Cerasani, Facilitator

Introductions and Welcome, Matt Tejada, EPA, Director, Office of Environmental Justice

Opening Remarks, Steven Cook, EPA, Deputy Assistant Administrator, OLEM Overview of Recommendation 40, Ellen Manges, EPA Acting Deputy Director, OCPA

#### **9:30 am Panel Discussion: Grounding in EJ Community Perspectives (30 minutes)**

Speaker: Sylvia Orduno, Michigan Welfare Rights Organization, Detroit, MI

Speaker: Angelo Logan, Moving Forward Network, Long Beach, CA

Moderator: Lena Kim Adams, US EPA, Region 3- Philadelphia

#### **10:00 am Sub-Group Presentations (15 minutes each)**

Sub-groups will report out on summaries of observations, finding, guiding principles, and recommendations. We will also identify questions, needs and concerns.

#### **10:45 am Break (15 minutes)**

#### **11:00 am Activity: Brainstorm ideas in response to 2 or 3 guiding questions. Identify and triage ideas with greatest potential impact on engaging w/EJ communities thru multi-voting. (1 hr, 30 min)**

## AFTERNOON SESSION

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12:30 pm **Networking Lunch** (30 minutes)

1:00 pm **Sub-Group Breakout Session** (1 hour, 30 minutes)

Each sub-group will meet to:

- ✦ Consider community perspectives from morning session
- ✦ Consider input from ideas generation and evaluation activity
- ✦ Refine observations, findings, guiding principles, and recommendations
- ✦ Capture refined recommendations on flip chart paper

“Gallery Walk” to review each subgroup’s plans

2:30 pm **Review refined recommendations by sub-groups** (1 hour)

3:30 pm **Break** (10 minutes)

3:40 pm **Activity:** Decide on recommendations (1 hour, 20 minutes)

5:00 pm **Next Steps and Wrap-up** (30 minutes)

5:30 pm **Adjourn**