

# Environmental Justice Strategic Plan

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



December 2024

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## Executive Summary

The U.S. Environmental Protection Agency (EPA or agency) has established environmental justice, external civil rights, and equity as centerpieces of the agency's mission. Consistent with the EPA's 5-year strategic plan ([Fiscal Year \(FY\) 2022 – FY 2026 EPA Strategic Plan](#)), the EPA's [FY 2024 - FY 2025 Agency Priority Goal Action Plan](#), and the EPA's [Equity Action Plan](#), the agency outlines its environmental justice goals, objectives, priority actions, and metrics in this Environmental Justice Strategic Plan (EJ Strategic Plan).

[Executive Order \(EO\) 14096](#) establishes the first Federal government definition for "environmental justice." [EO 14096](#) also directs all federal agencies in the executive branch to exercise leadership; identify, analyze, and address disproportionate and adverse effects from federal activities, consistent with applicable laws and in alignment with [EO 14096](#); develop environmental justice strategic plans; and pursue a whole-of-government approach to further the federal government's efforts to deliver real and measurable progress for environmental justice. Through this EJ Strategic Plan, the EPA has identified three goals and eight objectives that the agency will carry out to address the charges in [EO 14096](#) and to advance environmental justice and external civil rights. The goals are:

1. Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, Local, and Community Levels;
2. Embed Environmental Justice and External Civil Rights into the EPA's Programs, Policies, and Activities; and
3. Strengthen Civil Rights Enforcement to Protect Access to a Healthy Environment for All People.

The goals, objectives, priority actions, and metrics identified in this EJ Strategic Plan are rooted in the agency's historic commitment to environmental justice, as demonstrated by over 32 years of experience and work through the agency's environmental justice programs. The EJ Strategic Plan builds upon the substantive work accomplished by the agency's previous environmental justice strategic plans, such as [Plan EJ 2014 \(FY 2010 – FY 2014\)](#) and the [EJ 2020 Action Plan \(FY 2016 – FY 2020\)](#). The EPA developed several guidance documents identified in these previous strategic plans as critical for integrating environmental justice into the agency's core functions (i.e. permitting, regulatory development, enforcement, etc.), and the EPA continues to integrate environmental justice through their implementation.

The agency continues to explore best practices to prioritize program resources, allocate funding, implement statutory authorities, and engage with Tribes, territories, states, local governments, and communities most affected by environmental and health burdens. Recent developments include embedding environmental justice and external civil rights as strategic goals in the [FY 2022 – FY 2026 EPA Strategic Plan](#), emphasizing [the advancement of justice and equity as a fourth](#)

[foundational principle](#) for the agency, establishing the agency’s national Office of Environmental Justice and External Civil Rights (OEJECR), and substantially increasing financial and technical resources to help communities address their priority environmental and human health concerns—including communities that are disadvantaged, vulnerable, underinvested, and/or overburdened.

The EPA’s commitment to the meaningful public participation of all people in agency policy, programs, and activities extends across (and beyond) this EJ Strategic Plan. The [FY 2022 – FY 2026 EPA Strategic Plan](#), the EPA’s 2023 [Equity Action Plan](#), and the [FY 2025 – FY 2026 National Program Guidances](#) were shaped by feedback the agency received from engagements with various partners and stakeholders. Throughout these efforts, the agency received and considered recommendations from Federal Advisory Committees such as the White House Environmental Justice Advisory Council (WHEJAC) and the National Environmental Justice Advisory Council (NEJAC), as well as comments and input from Tribes, state agencies, local governments, associations, advocacy groups, businesses, and individuals on the agency’s strategic priorities and commitments. The public comment and Tribal consultation from these efforts continue to inform the EPA’s efforts to advance environmental justice, external civil rights, and equity—as exemplified in this EJ Strategic Plan.

This EJ Strategic Plan also furthers the Biden-Harris Administration’s [Justice40 Initiative](#), which sets the goal for the federal government to deliver 40% of the overall benefits of certain historic federal investments—including in climate, clean energy, remediation, reduction of legacy pollution, and the development of critical clean water and wastewater infrastructure—to disadvantaged communities. In line with that initiative, the EPA established a goal for the Agency’s [Justice40 pilot programs and Bipartisan Infrastructure Law \(BIL\) or Inflation Reduction Act \(IRA\) Justice40-covered programs](#) to deliver at least 40% of the benefits from certain federal investments to disadvantaged communities.<sup>1</sup> Highlights and updates on Justice40 progress are provided through the [Environmental Justice Scorecard for EPA](#).

While this EJ Strategic Plan builds on the EPA’s commitment to advance environmental justice, equity, and external civil rights, it is not intended to provide a comprehensive account of the agency’s extensive environmental justice efforts. The plan highlights progress, priority actions, and commitments responsive to the goals and objectives identified in the plan. More information about the EPA’s environmental justice efforts is available on the agency’s [environmental justice webpage](#). Progress on the EPA’s commitments in this EJ Strategic Plan will be reflected in the EPA’s environmental justice assessment of this EJ Strategic Plan, as required by [EO 14096](#). Further

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<sup>1</sup> As of November 2023, EPA has 79 total J40 covered programs, listed [here](#).

updates and revisions to the EPA's EJ Strategic Plan will align with the EPA's current 5-year strategic plan and with the [EO 14096](#) charges to federal agencies.

## EPA's Environmental Justice Vision Statement

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*The EPA will advance environmental justice to achieve tangible progress in the health and environmental protection for communities across the country—including communities that are vulnerable, underinvested, and/or overburdened by pollution and/or the impacts of climate change.*

*In doing so, the EPA will work to advance compliance with our nation's environmental and civil rights laws to ensure the just treatment and meaningful engagement of all people—regardless of income, race, color, national origin, Tribal affiliation, or disability—in agency decision-making and other EPA activities that affect human health and the environment.*

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The agency's vision to advance environmental justice is deeply embedded in its mission to protect human health and the environment. Consistent with the agency's statutory responsibilities, the EPA is advancing environmental justice through the implementation of the EPA's core work, with the aim of achieving tangible environmental and human health improvements in communities—including communities that are overburdened and/or underinvested. For example, communities that are overburdened may have greater vulnerability or exposure to environmental hazards; communities that are underinvested may face barriers to accessing (or using) essential places, services, or resources and economic opportunities.<sup>2</sup>

The agency advances this vision for the just treatment and meaningful engagement of all people—regardless of income, race, color, national origin, Tribal affiliation, or disability—in agency decision-making and other EPA activities that affect human health and the environment. This work includes implementing non-regulatory programs, implementing environmental laws, developing regulations and policy, and vigorously enforcing environmental and civil rights laws for all so that “people have equitable access to a healthy, sustainable, and resilient environment in which to live, play, work, learn, grow, worship, and engage in cultural and subsistence practices.”<sup>3</sup> The EPA's vision for environmental justice is centered on the agency's promise of protecting human health and the environment for all communities across the country to ensure that communities receive the full benefits of the EPA's decades of progress. No group of people

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<sup>2</sup> The terms used in this document are specific to the “EJ Strategic Plan.” The EPA recognizes that terms continue to evolve and may be updated. Readers may find additional information about relevant terminology at: <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>.

<sup>3</sup> Section 2(b), Executive Order 14096: Revitalizing Our Nation's Commitment to Environmental Justice for All (April 26, 2023). See <https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all>.

should bear disproportionate environmental, health, or quality of life burdens resulting from industrial, government, and commercial operations or policies.

Environmental injustices faced by communities are often linked with (or are the product of) policy and planning decisions—such as redlining, exclusionary zoning, improper zoning, discrimination, segregation, or other incompatible and/or discriminatory land use decisions or patterns. Examples of discriminatory land use decisions or patterns include the routing of highways and other transportation corridors that have divided neighborhoods, or the siting of polluting facilities and landfills in locations that cause adverse cumulative environmental and health burdens.<sup>4</sup> The agency is committed to breaking the cycle of historic environmental injustice and discrimination while maximizing protection for affected communities, who often also face challenges from the effects of the changing climate.<sup>5</sup>

The EPA prioritizes meaningful engagement and public participation in its work—which includes providing members of the public with timely opportunities to participate in (and inform) the EPA’s decision-making processes. These steps include planning and providing appropriate opportunities for meaningful engagement depending on the scope and potential impacts of the EPA action; providing technical assistance, tools, and resources—including collaboration and conflict resolution support; ensuring accessible and timely information and notices; and addressing barriers to participation. With the vision statement, goals, objectives, priority actions, and metrics outlined in the EPA’s EJ Strategic Plan, the agency will continue to center its work on the integration of environmental justice, external civil rights, and equity across the nation’s environmental protection programs, policies, and activities.

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<sup>4</sup> In 2013, the EPA published “Creating Equitable, Healthy, and Sustainable Communities: Strategies for Advancing Smart Growth, Environmental Justice, and Equitable Development,” which highlights challenges to building healthy, sustainable, and inclusive communities. The document also highlights strategies linking smart growth, environmental justice, and equitable development. See <https://www.epa.gov/smartgrowth/creating-equitable-healthy-and-sustainable-communities>.

<sup>5</sup> Pursuant to a permanent injunction issued by the U.S. District Court for the Western District of Louisiana on August 22, 2024, the EPA will not impose or enforce any disparate-impact or cumulative-impact-analysis requirements under Title VI against any entity in the State of Louisiana. [Click here for additional information](#).

## Overall Approach to Advancing Environmental Justice

The EPA's ultimate goal for environmental justice is advancing measurable environmental, public health, and other quality of life improvements in communities. The agency is committed to exploring best practices to achieve these improvements—including how the EPA prioritizes program resources for communities that are disadvantaged, vulnerable, underinvested, and/or overburdened, and how the agency addresses barriers to federal funding.

Consistent with [EO 14096](#) and in addition to the EPA's three strategic goals in this EJ Strategic Plan, below are examples of actions or milestones that highlight the EPA's overall approach to advance environmental justice and external civil rights.

### Institutionalizing Environmental Justice

1. The EPA elevated environmental justice and civil rights issues to the highest levels of the agency by establishing the EPA [Office of Environmental Equity/Justice](#) in 1992, launching [OEJECR](#) in 2022, and creating new divisions in each of the EPA's 10 regional offices in 2024 to align with OEJECR.
2. The EPA established the [National Environmental Justice Advisory Council](#) (NEJAC) in 1993 and continues to receive advice on cross-cutting issues related to environmental justice. This [Federal Advisory Committee](#) provides a valuable forum for discussions about integrating environmental justice with other agency priorities and initiatives.
3. The creation of (and continued updates to) [EJScreen](#)—an environmental justice mapping and screening tool—has provided the EPA with a nationally consistent dataset and approach for combining environmental and socioeconomic indicators, including indicators for health burdens, climate change, and critical service gaps. In its [2024 update](#), [EJScreen](#) (Version 2.3) included people with disabilities in the tool's supplemental demographic index to reflect the definition of “environmental justice” in [EO 14096](#) as including “the just treatment and meaningful involvement of all people, regardless of . . . disability, in agency decision-making and other Federal activities that affect human health and the environment.”
4. As a co-chair of the National Science and Technology Council's Environmental Justice Subcommittee, and with representation on the writing co-lead team, the EPA assisted in the preparation of the [Environmental Justice Science, Data, and Research Plan \(Research Plan\)](#)—which was published in July 2024. The Research Plan provides recommendations, principles, information, and resources that can assist agencies in advancing the goals of [EO 14096](#) in agency activities related to science, data, and research, as appropriate under each agency's respective authorities, missions, and consistent with applicable law. The plan also includes EPA-specific recommendations focused on exploring opportunities to include additional analysis of disproportionate and adverse human health and



environmental effects of toxic chemical releases in the [Toxic Release Inventory \(TRI\) National Analysis](#) and pursuing continuous improvement in TRI data quality related to environmental justice.

5. The EPA's planned [update](#) of the [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis](#) will reflect the current state-of-the-science, new peer-reviewed agency guidance, and new terminology, priorities, and direction (including terminology, priorities, and direction identified in [EO 14096](#)). The guidance will discuss technical approaches that can be used by agency analysts to evaluate environmental justice concerns for regulatory actions and underscore the EPA's ongoing commitment to ensuring the just treatment and meaningful involvement of all people with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.
6. The EPA released [EPA Legal Tools to Advance Environmental Justice: Executive Order 14096 Addendum \(EO 14096 Addendum\)](#), an update that highlights important new elements of [EO 14096](#), explores the executive-wide agency directives and EPA-specific directives included in EO 14096, and discusses the relationship between EO 14096 and the conclusions drawn in the EPA's [Environmental Justice Legal Tools](#) and the [Cumulative Impacts Addendum](#).<sup>6</sup>

### **Just Treatment, Equitable Access, and Protection from Environmental Injustice**

1. The EPA Office of Research and Development (ORD) published the [Cumulative Impacts Research: Recommendations for EPA Office of Research and Development](#) to inform the agency's [FY 2023 – 2026 Strategic Research Action Plans](#). This report focuses on recommendations to enhance cumulative impacts research and also includes recommendations for how ORD can provide management support to facilitate this complex research.
2. The EPA Office of Enforcement and Compliance Assurance (OECA) [issued four memoranda](#) directing enforcement staff to use all available tools to strengthen environmental justice considerations in the civil, criminal, and cleanup enforcement programs.
3. The EPA has issued a number of rulemakings that are anticipated to protect public health, including in overburdened communities.<sup>7</sup> The EPA Office of Air and Radiation (OAR) issued rulemakings under its statutory authorities, including the following:
  - a. [Final Review of the National Ambient Air Quality Standards for Particulate Matter](#);

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<sup>6</sup> Pursuant to a permanent injunction issued by the U.S. District Court for the Western District of Louisiana on August 22, 2024, the EPA will not impose or enforce any disparate-impact or cumulative-impact-analysis requirements under Title VI against any entity in the State of Louisiana. [Click here for additional information.](#)

<sup>7</sup> For additional information on other EPA rules issued or in progress, see <https://www.epa.gov/laws-regulations/regulations#track>.

- b. [Final Organic National Emission Standards for Hazardous Air Pollutants \(NESHAP\) and Synthetic Organic Chemical Manufacturing Industry \(SOCMI\) New Source Performance Standards, and Polymers and Resins](#);
- c. [Final National Emission Standards for Hazardous Air Pollutants \(HAPs\): Integrated Iron and Steel Manufacturing Facilities Technology Review](#);
- d. [Final Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-duty and Medium-duty Vehicles](#); and
- e. [Final Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles - Phase 3 standards](#).

### **Considering the Health of Children at All Life Stages**

1. Children living in communities that are vulnerable, underinvested, and/or overburdened may be at greater risk of environmental harm and reduced environmental health resilience, which may result in lifelong impacts. The EPA developed a dedicated cross-agency strategy (Cross-Agency Strategy #2) in its [FY 2022 – FY 2026 EPA Strategic Plan](#) that focuses on protecting and improving the health of children at all life stages—from conception to age 21—in the implementation of the EPA’s programs.<sup>8</sup> The EPA recognizes that the effects of early life exposures may become apparent during childhood and/or may not arise until adulthood or in later generations. This cross-agency strategy includes the agency’s commitment to apply and promote the use of science, policy, partnerships, communications, and action to protect children from adverse health effects resulting from harmful environmental exposures.
2. The EPA’s actions will be informed by two important considerations: (1) the scientific understanding of childhood as a sequence of life stages—from conception through infancy and adolescence to early adulthood (age 21)—during which there is both greater vulnerability and potentially greater exposure to environmental contaminants than during adulthood, and (2) the recognition that protecting children’s health at all life stages is necessary to achieve the agency’s mission.<sup>9</sup>
3. The EPA Office of Children’s Health Protection (OCHP) and OEJECR will develop a working draft of a training on children’s environmental health and environmental justice interlinkages for the EPA’s environmental justice and children’s environmental health workforce. This training will raise awareness of children’s distinct biological, developmental, and behavioral vulnerabilities and exposures to environmental contaminants in the context of environmental justice work through case studies,

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<sup>8</sup> See EPA’s [Policy on Children’s Health](#) or Executive Order 13045: Protection of Children from Environmental Health Risks and Safety Risks (April 23, 1997); <https://www.epa.gov/laws-regulations/summary-executive-order-13045-protection-children-environmental-health-risks-and>.

<sup>9</sup> For more information, see <https://www.epa.gov/children>.

storytelling, and direct instruction to ensure environmental health protections for children in communities that are vulnerable, underinvested, and/or overburdened.

4. The EPA will enhance its national children's health indicators (America's Children and the Environment or ACE) to better reflect burdens and disparities for children related to social determinants of health.<sup>10</sup> The EPA is considering updating this tool and possibly adding factors to this tool to incorporate additional social determinants of health.

### **Meaningful Involvement, Engagement, and Information**

1. The EPA released its [Achieving Health and Environmental Protection through EPA's Meaningful Engagement Policy](#) (Meaningful Engagement Policy) in September 2024. The Meaningful Engagement Policy is an update to the EPA's 2003 Public Involvement Policy that builds on the EPA's established commitment to meaningful engagement. The EPA's Meaningful Engagement Policy is grounded in the acknowledgment that the EPA's actions and processes result in strengthened decisions to protect health and the environment when they are informed by diverse voices, lived experiences, and expertise.
2. Following [EO 14096](#), the EPA launched an [EJ Clearinghouse](#) in April 2024. The EJ Clearinghouse serves as a public, whole-of-government, online database composed of culturally and linguistically appropriate and accessible materials related to environmental justice.
3. Through the [Community, Equity, & Resiliency Initiative](#), OAR and OEJECR facilitated community-driven partnerships and provided a space for communities—especially low-income and disadvantaged communities—to learn, connect, and cultivate ideas on how to access historic resources. This three-phase initiative included: (1) access to resources to help communities—including the [technical assistance hub](#) and [data tools](#); (2) a national [Virtual Open House](#) to kickstart community-driven conversations on IRA and other new Investing in America funding opportunities; and (3) [regional "Roadshow" events](#) that provide opportunities for potential grant applicants and community leaders to explore suitable IRA and other Investing in America funding opportunities.

### **Work and Partnership with Non-Federal Entities**

1. The EPA is establishing the [Community-Engaged Research Collaborative for Learning and Excellence \(CERCLE\)](#) to align the EPA's science with the needs of local, underrepresented, or underinvested communities. This first-of-its-kind facility will encourage EPA researchers and communities to co-produce research that is designed to benefit communities, as well as contribute to scientific knowledge. The applied, collaborative, and community-based research conducted through CERCLE will serve as a model (and resource) for building

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<sup>10</sup> For more information, see <https://www.whitehouse.gov/wp-content/uploads/2023/11/SDOH-Playbook-3.pdf>.

relationships with communities with environmental justice concerns and for addressing community challenges nationwide—including environmental justice, climate adaptation, and community resilience. Impacts of this effort will be assessed through feedback from local communities and through the EPA Board of Scientific Counselors.

2. By establishing and implementing the federal interagency [Environmental Justice Thriving Communities Network](#), the EPA coordinates place-based financial assistance, technical assistance, and capacity-building resources for urban, rural, and Tribal communities that experience a history of economic distress and systemic disinvestment. Programs under the EPA’s Environmental Justice Thriving Communities Network include the [Environmental Justice Thriving Community Technical Assistance Centers](#) (EJ TCTACs) [Environmental Justice Thriving Communities Grantmaking](#) (EJ TCGM) program, and the [Community Change Grants](#) program (Community Change Grants).<sup>11</sup>
3. Through the [Community Change Grants](#), the EPA is investing approximately \$2 billion dollars in IRA funds for community-driven environmental and climate justice activities that reduce pollution, increase community climate resilience, and build community capacity. With \$200 million of IRA technical assistance funds, the EPA will also provide funding for technical assistance to eligible entities related to the EPA’s [Environmental and Climate Justice program](#).<sup>12</sup>
4. Through the [Climate Pollution Reduction Grant \(CPRG\) program](#), the EPA is investing \$5 billion in grants to states, local governments, Tribes, and territories to develop and implement ambitious plans for reducing greenhouse gas emissions and other harmful air pollution.<sup>13</sup>

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<sup>11</sup> These and many other programs that provide technical assistance and other kinds of benefits to communities marginalized by underinvestment and overburdened by pollution (also known as disadvantaged communities or Justice40 communities) are covered by and advance the goal of the [Justice40 Initiative](#).

<sup>12</sup> This program is covered by and advance the goal of the [Justice40 Initiative](#).

<sup>13</sup> This program is covered by and advance the goal of the [Justice40 Initiative](#).

## Advancing Environmental Justice Through Goal-Setting

The EPA has three environmental justice and external civil rights goals to guide its work, each with its own set of objectives, priority actions, and metrics (see Appendix for a “Summary of EPA’s EJ Strategic Goals, Objectives, and Metrics”). These goals are:

1. Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, Local, and Community Levels;
2. Embed Environmental Justice and External Civil Rights into the EPA’s Programs, Policies, and Activities; and
3. Strengthen Civil Rights Enforcement to Protect Access to a Healthy Environment for All People.

The first goal focuses on the EPA’s ability to advance environmental justice and external civil rights with the agency’s external partners through the support the agency provides directly to federal agencies, Tribes, states, local governments, and communities.

The second goal focuses on advancing environmental justice, external civil rights, and equity through the EPA’s program activities—such as regulatory and permitting actions, enforcement and compliance assurance, research, responding to emergencies, and cleaning up contamination. The EPA implements its environmental laws under a range of statutes to protect public health and the environment. As the EPA does this work, the agency recognizes that its civil rights obligations are separate and distinct from other obligations, including the obligations to comply with environmental laws. Advancing civil rights protection can help address concerns for communities that face discrimination in addition to severe pollution and environmental concerns.

The final goal focuses on the EPA’s commitment to strengthen the agency’s Office of External Civil Rights Compliance (OECRC) and its ability to enforce federal civil rights laws in the environmental context. As [EO 14096](#) emphasizes, the EPA is charged with advancing environmental justice for all by implementing and enforcing the Nation’s environmental and civil rights laws.<sup>14</sup> EPA is advancing this goal to ensure compliance with external civil rights laws by issuing policy guidance, securing timely and effective resolutions to address discrimination, and fully implementing the EPA’s authority to conduct affirmative compliance reviews and protect access to a healthy environment for all people.

These three goals establish targets that align closely with Administration priorities and priority goals, including those set forth in the following Executive Orders (EO):

- [EO 14096](#): Revitalizing Our Nation’s Commitment to Environmental Justice for All.

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<sup>14</sup> In addition to EO 14096, see also <https://www.epa.gov/environmentaljustice/learn-about-environmental-justice>.

- [EO 14057](#): Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability.
- [EO 14091](#): Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.
- [EO 14008](#): Tackling the Climate Crisis at Home and Abroad.
- [EO 13895](#): Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.
- [EO 12898](#): Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.<sup>15</sup>

It is important to note that in the “priority actions” under each objective in this EJ Strategic Plan, the phrase “national programs and regions” is used as a general term for each list of activities. In some cases, actions listed are not applicable to every program office or regional division. OEJECR continues to work in partnership with programs and regions to determine scope, applicability, and flexibility for the work outlined in this document.

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<sup>15</sup> EO 14096 supplements EO 12898.

## **Goal 1: Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, Local, and Community Levels.**

Communities with environmental justice concerns have often experienced decades of chronic underinvestment, barriers to access the EPA's programs and resources to achieve environmental improvements, and/or barriers to engage in the EPA's decision-making processes. Despite these circumstances, communities with environmental justice concerns continue to organize by developing their own visions of well-being and resilience, advocating for change, and influencing public policy. The EPA has the potential to make transformative progress at the federal, Tribal, territorial, state, and local levels through a whole-of government approach. The agency can also achieve transformative progress when it meaningfully engages and involves communities in its activities and decision-making processes.

The EPA is committed to working with Tribes, territories, states, local governments, community leaders, and/or other federal agencies. The EPA plans to increase investments for environmental justice and external civil rights activities and programs, remove systemic barriers, and support capacity-building to ensure that, as the EPA provides resources to communities and governments, communities and governments are ready to receive (and apply) those resources and make positive change on the ground. To bolster effective engagement with Tribes, territories, states, local governments, partner agencies, and communities, the agency will apply collaboration and conflict resolution support, as needed.

To achieve this goal, the EPA aims to meet these two objectives:

- ✓ **Objective 1.1:** Build Capacity and Climate Resilience in Communities that are Overburdened and Underinvested.
- ✓ **Objective 1.2:** Engage and Support Tribes and Federal, State, and Local Governments to Achieve Results in Communities.

## **Objective 1.1: Build Capacity and Climate Resilience in Communities that are Overburdened and Underinvested.**

While many communities face a legacy of environmental justice issues such as toxic chemical exposure, hazardous facility siting, and lack of safe drinking water, these same communities may also face a rapidly growing set of social and ecological concerns from climate change—such as access to financial resources, health care, social services, and safe and nutritious food.<sup>16</sup> These compounded challenges can exacerbate systemic barriers and complicate community members' capacity to prepare competitive proposals to access problem-solving resources, manage federal awards to address environmental justice concerns, or engage in decision-making that deeply affects their communities' abilities to anticipate, respond to, and recover from climate-related changes.<sup>17</sup>

For decades, communities that are overburdened and/or underinvested have requested tools and resources from federal agencies to successfully compete for federal funding and effectively participate in the agency's decision-making processes. The EPA commits to establishing the necessary policies, tools, and other mechanisms to build capacity with (and in) communities so that the voices, perspectives, and lived experiences of communities are heard and reflected in the agency's priorities, policies, and decision-making. Capacity-building resources should be tailored to fit the need (or scale) of a particular program in the community, which often include:

- ✓ Trainings (such as workshops, train-the-trainer, etc.),
- ✓ Handbooks (such as best practices guides),
- ✓ Individual support or mentoring (where appropriate) from the EPA, and/or
- ✓ Capacity-building provided through the EPA's technical assistance programs or the EPA's financial assistance programs.

Through the [Thriving Communities Network](#), the EPA and other federal agencies are coordinating closely on place-based financial assistance, technical assistance, and capacity-building resources for urban, rural, and Tribal communities to ensure that the once-in-a-generation investments from the Bipartisan Infrastructure Law (BIL), the Inflation Reduction Act (IRA), and the American Rescue Plan (ARP) create long-term benefits nationwide. This includes efforts like the EPA's [Environmental Justice Thriving Communities Technical Assistance Centers](#) (EJ TCTACs), [Environmental Justice Communities Grantmaking](#) (EJ TCGM) program, and the [Environmental and Climate Justice Community Change Grants](#) program (Community Change Grants). These and [many other programs](#) that provide technical assistance and other kinds of benefits to communities marginalized by underinvestment and overburdened by pollution (also known as disadvantaged

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<sup>16</sup> See <https://www.epa.gov/climateimpacts/climate-change-and-health-socially-vulnerable-people>.

<sup>17</sup> See <https://www.epa.gov/environmentaljustice/equity-action-plan>.



communities or Justice40 communities) that are covered by and advance the goal of the [Justice40 Initiative](#).

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.<sup>18</sup>

## Priority Actions

*To empower and strengthen capacity of communities:*

1. OEJECR will manage dedicated technical assistance programs to build capacity for community-based organizations, local and Tribal governments, and other [eligible entities](#) serving communities with environmental justice concerns. This includes the technical assistance that will be provided through the EPA's [eighteen TCTACs](#) ([three National TCTACs](#) and [fifteen Regional TCTACs](#)), which will provide access to technical assistance for thousands of capacity-constrained communities across the nation, free-of-charge and with no application required to identify and apply for funding opportunities.
2. OAR will implement IRA and BIL funded programs, such as:
  - a. [Climate Pollution Reduction Grants](#) (Planning and Implementation)
  - b. [Clean Ports](#)
  - c. [Clean Heavy-Duty Vehicles](#)
  - d. [Clean School Bus](#)
  - e. [Methane Emission Reduction Program](#)
  - f. [Indoor Air at Schools](#)
  - g. [Diesel Emissions Reduction Act](#)
  - h. [Community-Scale Air Toxics Ambient Monitoring](#)
3. Through the [Get the Lead Out \(GLO\) Initiative](#), the agency will build upon the EPA's [Lead Service Line Replacement Accelerators technical assistance initiative](#) to provide communities—including disadvantaged communities—with the tools and technical assistance to (1) address barriers to lead pipe removal and (2) accelerate lead service line replacements. This includes technical assistance to help communities identify lead service lines, develop replacement plans, increase the public's awareness of recently published EPA guidance documents, and to help communities apply for funding to get the lead out.
4. The EPA will continue funding and operationalizing the national network of 11 [Environmental Justice Thriving Community National and Regional Grantmakers](#), which will

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<sup>18</sup> It is important to note that in the “priority actions” under each objective in this EJ Strategic Plan, the phrase “national programs and regions” is used as a general term for each list of activities. In some cases, actions listed are not applicable to every program office or regional division. The EPA Office of Environmental Justice and External Civil Rights (OEJECR) continues to work in partnership with programs and regions to determine scope, applicability, and flexibility for the work outlined in this document.

distribute competitive and non-competitive subawards. Each [Regional Grantmaker](#) will distribute 80% of its awards throughout communities in its regions.

5. The EPA will invest about \$2 billion of IRA funding through the [Community Change Grants](#). These activities will benefit disadvantaged communities through projects that reduce pollution, increase community climate resilience, and build community capacity to address environmental and climate justice challenges. They are designed to deliver on the transformative potential of the IRA for communities with environmental justice concerns, including those that are most disproportionately and adversely burdened by climate change, legacy pollution, and historical disinvestments.
6. With \$200 million of IRA technical assistance funds, the EPA will provide funding for technical assistance to eligible entities related to the EPA's [Environmental and Climate Justice program](#).
7. The EPA is partnering with the [Commission for Environmental Cooperation](#) to develop a new environmental justice action center to promote equitable environmental and climate resilience across North America.
8. Before collecting feedback about a specific agency action (decision/event), the EPA's national programs and regions will provide capacity-building resources to the community and public to ensure their participation informs the agency's decision-making, as applicable. This includes providing community capacity-building resources with learning objectives that are focused on building skills so communities can apply, analyze, and evaluate the subject, topic, or issue at hand.

*To engage with and listen to communities:*

1. The EPA and its partners (non-government organizations and local, state, Tribal, and federal governments) are working with [Colonias](#) in the Southwest to establish a holistic approach to identify solutions to long-standing hardships faced by these communities to (1) enhance the collective understanding of long-term human health disparities, challenges, and program designs; (2) build collaborative approaches to identify and develop community-based solutions; and (3) identify potential resources and opportunities for long-term solutions.<sup>19</sup>

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<sup>19</sup> Currently, the EPA does not have an official definition for Colonias and generally follows the U.S. Department of Housing and Urban Development (HUD) and the U.S. Department of Agriculture (USDA) Rural Development definition. HUD and USDA Rural Development both define Colonias as "rural communities within the US-Mexico border region that lack adequate water, sewer, or decent housing, or a combination of all three. This definition is broader than the iconic image of a colonia as a scattered rural homestead on inappropriately subdivided land, with housing made of salvaged materials, and no utilities. The definition encompasses other types of communities as well, such as dense settlements of modular housing or trailer homes." For more information, see <https://www.hudexchange.info/programs/cdbg-colonias/colonias-history/>.

2. OECRC and the EPA's regional environmental justice programs will deliver information sharing sessions and outreach on environmental justice and civil rights issues with communities that are vulnerable, underserved, and/or overburdened and with environmental justice advocacy groups.
3. The EPA Office of Land and Emergency Management (OLEM) will conduct outreach and engagement to state, local, and Tribal partners and communities with environmental justice concerns to build their capacity to access [Brownfield grant opportunities](#) and land revitalization assistance. This includes conducting "roadshow" events in specific areas where there appear to be gaps in the distribution of Brownfields resources over the last three years.
4. In addition to the Brownfields Program's own [technical assistance efforts to Brownfields communities](#), OLEM will distribute grant and technical assistance information through key EPA sources—such as the [grants and funding database from the TCTACs](#), through the [TCTACs](#) themselves, and others.

## Metrics

- ✓ Percentage of the EPA's national programs and regions that provide capacity-building resources to communities with environmental justice concerns to improve how the public's feedback and comments inform the agency's decision-making process.
- ✓ Number of technical assistance services delivered by the EJ TCTACs which include, but are not limited to, services related to capacity-building, outreach and engagement, and grants.
- ✓ Number of new community-driven partnerships working collaboratively to implement change-making projects on the ground in communities.<sup>20</sup>
- ✓ Total funding for grant resources flowing to disadvantaged communities from Environmental and Climate Justice programs covered under the Justice40 Initiative.
- ✓ Number of lead service line replacements funded in disadvantaged communities (as defined by states).<sup>21</sup>
- ✓ Number of information sharing sessions and outreach and technical assistance events held with overburdened and/or underserved communities and environmental justice advocacy groups on environmental justice and civil rights issues.

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<sup>20</sup> This metric applies to financial and technical assistance programs under the EPA's [Environmental and Climate Justice Program](#). The number of Environmental and Climate Justice Program partnerships will be derived from workplans and progress reports.

<sup>21</sup> Under the [Safe Drinking Water Act](#), states are responsible for defining what constitutes a disadvantaged community. See <https://www.epa.gov/sdwa>.

## Objective 1.2: Engage and Support Tribes and Federal, State, and Local Governments to Achieve Results in Communities

Promoting environmental justice and external civil rights throughout all of the EPA's programs and activities depends on the EPA's commitments, relationship building, engagement, legal authority, and trust with Tribes, territories, states, local governments, and partner agencies. One of the ways that the agency aims to increase accountability towards environmental justice and civil rights enforcement is through the EPA's plans to invest in guidance, tools, metrics, and assistance for Tribes, territories, states, local governments, partner agencies, and communities.<sup>22</sup>

In August 2024, OECRC released [Civil Rights Guidance on Procedural Safeguards: Requirements and Best Practices](#)—a guidance document created to assist recipients of the EPA's financial assistance (such as grantees) when they are developing and improving their legally required civil rights compliance efforts.<sup>23</sup> Efforts like these build on the EPA's and federal government's commitments to ensure the just treatment of all people—regardless of income, race, color, national origin, Tribal affiliation, or disability—throughout the EPA's programs and activities, consistent with applicable law.<sup>24</sup>

The EPA will also initiate a new era of proactive support and engagement with its federal partners. For example, the EPA will expand its environmental justice and civil rights in permitting trainings for federal employees by adding additional modules focusing on screening and community engagement. Additionally, through its review of other federal agencies' National Environmental Policy Act (NEPA) documents pursuant to NEPA and Section 309 of the Clean Air Act, the EPA promotes the consideration of environmental and public health effects and the mitigation thereof

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<sup>22</sup> See <https://www.performance.gov/agencies/EPA/apg/fy-24-25/>

<sup>23</sup> EPA enforces federal civil rights laws that together prohibit discrimination on the bases of race, color, national origin (including limited-English proficiency) (Title VI of the Civil Rights Act of 1964 (Title VI)), disability (Section 504 of the Rehabilitation Act of 1973 (Section 504)), sex (Title IX of the Education Amendments of 1972 (Title IX)); Section 13 of the Federal Water Pollution Control Act Amendments of 1972 (FWPCA)), and age (Age Discrimination Act of 1975 (Age Discrimination Act)). All programs and activities of applicants for and recipients of EPA financial assistance have an affirmative obligation to comply with these laws and EPA's implementing regulations, as do any subrecipients of the primary recipient, and any successor, assignee, or transferee of a recipient, but excluding the ultimate beneficiary of the assistance. Pursuant to a permanent injunction issued by the U.S. District Court for the Western District of Louisiana on August 22, 2024, the EPA will not impose or enforce any disparate-impact or cumulative-impact-analysis requirements under Title VI against any entity in the State of Louisiana. [Click here for additional information.](#)

<sup>24</sup> In accordance with Title VI of the Civil Rights Act and all applicable legal requirements, the EPA works, consistent with applicable law, to advance the charge in [EO 14096](#) to comply with Title VI and Agency regulation to “ensure that all programs or activities receiving Federal financial assistance that potentially affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, policies, practices, or methods of administration that discriminate on the basis of race, color, or national origin.”

on communities with environmental justice concerns in the review of other federal agencies' NEPA documents.<sup>25</sup>

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.

## Priority Actions

*To build strong partnerships through the EPA's financial assistance programs:*

1. The EPA will plan and conduct three to six targeted trainings to states (virtual and in-person) to share best practices, promote understanding, transfer knowledge, and publicize the desirability and flexibility of the [Drinking Water State Revolving Fund's Lead Service Line Replacement \(DWSRF LSLR\)](#) program.
2. OEJECR will provide technical assistance and training to the EPA's financial assistance recipients—including technical assistance and training through a proactive initiative for working with EPA's regions and states—to facilitate the implementation of procedural safeguards and best practices, such as the EPA's [Civil Rights Guidance on Procedural Safeguards: Requirements and Best Practices](#). The EPA's national programs and regions will help facilitate this engagement with states to implement procedural safeguards and best practices.

*To engage and support federal agencies:*

1. The EPA Office of Federal Activities' NEPA Compliance Division will annually report to the White House Council on Environmental Quality and White House Environmental Justice Interagency Council on the EPA's NEPA Clean Air Act Section 309 reviews regarding communities with environmental justice concerns, and the agency will provide recommendations on legislative, regulatory, or policy options to advance environmental justice in federal decision-making, per the requirements under [EO 14096 Section 3.b.\(ii\)](#). To support its report on Clean Air Act Section 309 reviews, the Office of Federal Activities will annually track the number of 309 review letters with comments on environmental justice filed for draft environmental impact statement documents filed in the Federal Register in FY 2024.

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<sup>25</sup> [EO 14096](#) recognizes that all federal agencies should work to implement its policy objectives as part of their work to implement the National Environmental Policy Act (NEPA)—consistent with the statute and its implementing regulations—through the exercise of the agency's expertise and technical judgment. The EO directs the EPA—in carrying out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609—to “assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with environmental justice concerns.” Under Section 309 of the Clean Air Act, the EPA reviews NEPA documents—such as Environmental Impact Statements—for other federal agency actions that may include federal land management activities, transportation-related projects, and publicly owned facility construction, among others. See <https://www.epa.gov/nepa/epa-review-process-under-section-309-clean-air-act>.

2. The Office of Federal Activities' NEPA Compliance Division will modify its existing training curriculum for all NEPA/309 reviewers to include guidance and resources specific to environmental justice factors that should be considered during the EPA's NEPA reviews, consistent with Section 309 of the Clean Air Act and the directives in [EO 14096](#).
3. The Office of Federal Activities' Permit Policy Division will expand its internal environmental justice and civil rights in permitting trainings for EPA staff in FedTalent by adding additional modules that will focus on screening and community engagement.<sup>26</sup>

## Metrics

- ✓ Number of lead service line replacements funded in disadvantaged communities (as defined by states).<sup>27</sup>
- ✓ Percentage of required civil rights procedural safeguard elements implemented by state permitting agencies that are recipients of the EPA financial assistance.
- ✓ By September 30, 2026, the EPA will increase by 40% the number of the EPA Office of Research and Development (ORD) activities related to environmental justice that involve or are applicable to Tribes, states, territories, local governments, and communities.
  - Each year, the EPA will increase by an average of 10 percent from the baseline year (FY 2022) the number of ORD activities related to environmental justice that involve communities or are designed to be applicable to Tribes, states, territories, local government, and communities.<sup>28</sup>
  - Percentage of the ORD's environmental justice-related research products meeting partner needs.

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<sup>26</sup> FedTalent is the EPA's learning management system that is used to provide training to employees.

The system offers a wide range of features to support organizational learning (i.e., mandatory training, eLearning, blended learning, social learning, and classroom training administration).

<sup>27</sup> Under the [Safe Drinking Water Act](#), states are responsible for defining what constitutes a disadvantaged community. See <https://www.epa.gov/sdwa>.

<sup>28</sup> Additional information on this metric can be found in EPA's FY 2022-2026 ORD Data Quality Record for Goal 2, Objective 2.1: <https://www.epa.gov/system/files/documents/2022-07/fy22-26-dqr-2-1-increase-ord-ej-tribal-activities.pdf>.

## Goal 2: Embed Environmental Justice and External Civil Rights into the EPA's Programs, Policies, and Activities

There have been many advancements in the environmental and human health protections of communities with environmental justice concerns, but there is more to do to address the human health and environmental problems that remain unresolved. Communities that have multiple polluting facilities and operations or communities that are saturated with legacy pollution have asked the EPA to realign its work in a way that provides action, accountability, and guidance for taking cumulative impacts and risks into account. No community should bear disproportionate and adverse human health or environmental burdens from the nation's activities that the EPA regulates.

The EPA recognizes that both environmental justice and external civil rights must be embedded within each of the EPA's programs, policies, and activities to advance protections for the environment and human health in all communities—including communities that are vulnerable, underinvested, and/or overburdened. The EPA commits to realigning its programs, policies, and activities—as appropriate and consistent with the law—to address pollution (and other health and environmental impacts) that are often linked with historical drivers and barriers among communities with environmental justice concerns, such as the inequitable distribution and development of governmental resources, redlining, and impacts of climate change.

To achieve this goal, the EPA aims to meet these four objectives:

- ✓ **Objective 2.1:** Advance Measurable Environmental and Public Health Improvements in Communities that are Vulnerable, Underinvested, and/or Overburdened.
- ✓ **Objective 2.2:** Incorporate Tools and Environmental Justice Analyses that Identify and Address Disproportionate and Adverse Effects in the EPA's Decision-Making.
- ✓ **Objective 2.3:** Provide Meaningful Engagement Opportunities that Inform the EPA's Decision-Making.
- ✓ **Objective 2.4:** Ensure the EPA's Programs and Activities Consider External Civil Rights and Environmental Justice.



## **Objective 2.1: Advance Measurable Environmental and Public Health Improvements in Communities that are Vulnerable, Underinvested, and/or Overburdened.**

The EPA recognizes that it is essential to establish goals and identify necessary actions to achieve measurable environmental and public health improvements in communities with environmental justice concerns. This includes protecting children and other vulnerable populations who live in disproportionately burdened communities. As the climate changes, it is especially critical that the agency collaboratively develops solutions and implements strategies to protect overburdened populations from disproportionate and adverse health and environmental effects, consistent with applicable laws and in alignment with [EO 14096](#).<sup>29</sup> In working towards whole-of-government solutions, the EPA will consider how social determinants of health affect disproportionately burdened populations, especially as these challenges may reduce resiliency or ability to recover from exposure to environmental hazards.

Under the EPA's [FY 2024 – FY 2025 Agency Priority Goal Action Plan](#), the EPA expects to advance consideration of cumulative impacts by implementing performance metrics and a workplan across agency programs, consistent with applicable laws. Additionally, the agency will develop a set of indicators to track the EPA's progress in reducing burdens and disparities in environmental and public health conditions to show real, positive, and meaningful change on the ground for communities with environmental justice concerns directly related to agency efforts.<sup>30</sup> Each indicator will depict a notable disparity in an environmental or public health condition across race, ethnicity, or socioeconomic status, that can be influenced to some degree by the EPA's activities. The EPA will launch a public webpage with information about these indicators, and the webpage will describe examples of EPA activities that are related to reducing burdens and disparities.

The EPA plans to tie the indicators to reporting mechanisms in order to connect the outputs of the EPA's activities to the goal of reducing these burdens and eliminating these disparities. The activities to achieve these reductions will range from actions the EPA can take wholly within its authorities and its resources to activities that better support the actions of other governmental partners. Some examples include:

- ✓ Reducing childhood blood lead levels and childhood asthma prevalence.
- ✓ Protecting children equitably from exposure to environmental contaminants.

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<sup>29</sup> When "disproportionate and adverse effects" is used in this EJ Strategic Plan, the EPA is also referring to disproportionate and adverse impacts and risks—which aligns with the EPA's historical approach to advance EJ, including efforts to implement [EO 14096](#).

<sup>30</sup> [FY 2024 – FY 2025 Agency Priority Goal](#): Implement guidance, tools, and metrics for EPA and its Tribal, state, local, and community partners to advance environmental justice and external civil rights compliance. See <https://www.performance.gov/agencies/epa/apg/fy-24-25/>.



- ✓ Reducing exposure to pollutants that disproportionately burden communities with environmental justice concerns.
- ✓ Reducing exposure to environmental contaminants that lead to negative health outcomes, such as cardiovascular disease.
- ✓ Reducing pesticide exposure to farmworkers, their families, and the agricultural community, and improving health outcomes in rural communities.
- ✓ Reducing environmental harms for people with disabilities.
- ✓ Reducing cumulative environmental and health impacts in communities with environmental justice concerns.

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.

## Priority Actions

*To reduce disproportionate and adverse human health or environmental burdens:*

1. OEJECR will coordinate assessments of the disparity indicators and the effectiveness of the EPA's actions to assess the EPA's performance in reducing burdens and disparities in environmental and public health conditions over time.
2. The EPA will coordinate the completion of milestone activities as listed in the EPA's [FY 2024 - FY 2025 Agency Priority Goal Action Plan](#).
3. OEJECR will coordinate internal and external stakeholder engagement on the disparity indicators throughout the evolution of this work to share information, co-learn, and collaborate to co-develop new indicators and enhance future versions of existing indicators—drawing from participatory science, when possible.<sup>31</sup>
4. The EPA's national programs will participate in the development of disparity indicators and assist with agency coordination on tracking outputs and outcomes.

*To assess and address cumulative impacts:*

1. The EPA has commissioned the National Academies of Sciences, Engineering, and Medicine (National Academies) to undertake a review of the state-of-the-science of cumulative impacts. The National Academies has assembled an *ad hoc* committee that will convene two workshops and develop a consensus report to advise the EPA on how the agency might further develop the scientific foundation underlying the practice of cumulative impact assessment.<sup>32</sup>

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<sup>31</sup> The EPA's transition to the term "participatory science" represents the inclusive and accessible involvement of the public in the scientific process. Previous terms include citizen science, community science, crowd-sourced science, community-based participatory research, volunteer monitoring, public participation in scientific research, public science, open science, civic science, and do-it-yourself science.

<sup>32</sup> See <https://www.nationalacademies.org/our-work/state-of-the-science-and-the-future-of-cumulative-impact-assessment>.

2. In partnership with the EPA's national programs and regions, OEJECR will develop and implement an agency-wide work plan for assessing and addressing (reducing, eliminating, mitigating, preventing) cumulative impacts in communities. The work plan will include actions such as:
  - a. Developing approaches for agency decision-making—including policy and legal tools—to consider cumulative impacts;
  - b. Developing analytical methodologies and screening tools;
  - c. Developing trainings and program development initiatives related to cumulative impacts; and
  - d. Coordinating engagement with communities, partners, Federal Advisory Committees, and other interested parties to inform these programmatic efforts.
3. In collaboration with the EPA's national programs and regions, OEJECR will develop performance metrics for cumulative impacts assessment and actions.
4. OEJECR will coordinate with the EPA's national programs and regions to pilot cumulative impacts projects and develop case studies in partnership with communities and other federal, state, and Tribal partners.
5. The EPA will implement focus groups, webinars, and workshops to advance agency understanding of how to consider cumulative impacts. These efforts will focus on topics such as quantitative and qualitative methods for cumulative impacts assessment; community engagement; participatory science; disproportionate and adverse effects, consistent with applicable laws and in alignment with [EO 14096](#); historical drivers of concentrated environmental burden; and emerging cumulative impacts practices.

## Metrics

- ✓ The EPA will develop (or will continue to develop) indicators to identify disparities in environmental and public health conditions.
- ✓ Number of actions which advance consideration of multiple, disproportionate, and/or cumulative impacts, including decisions informed by such consideration. Actions can include facilitating discourse on emerging approaches, tools, and promising practices; developing and applying methods and tools; conducting research projects; building expertise, consensus, and capacity; improving cross-program, cross-agency, and multi-stakeholder engagements.

## Objective 2.2: Incorporate Tools and Environmental Justice Analyses that Identify and Address Disproportionate and Adverse Effects in the EPA’s Decision-Making.

[EO 14096](#) defines “environmental justice,” in part, as the just treatment and meaningful involvement of all people—regardless of income, race, color, national origin, Tribal affiliation, or disability—in decision-making and other federal activities that affect human health and the environment. Federal activities include agency rulemaking, guidance, or policy.<sup>33</sup>

Consistent with applicable laws and in alignment with [EO 14096](#), the EPA continues to make significant progress in fundamentally grounding its work—such as rulemaking—in addressing (reducing, eliminating, mitigating, preventing) disproportionate and adverse effects in communities that are vulnerable, underinvested, and/or overburdened. Addressing communities’ environmental justice concerns includes understanding and considering cumulative impacts and cumulative risks. To do this work, the EPA plans to rapidly advance and apply the use of analysis for disproportionate and adverse effects throughout agency programs and activities.<sup>34</sup>

A first step to catalyze such progress is the regular use of environmental justice and equity screening tools by the EPA’s programs. Screening tools help the EPA’s programs identify communities with environmental justice concerns, guide the EPA’s outreach, inform analysis of how communities are considered in decision-making (such as communities impacted or potentially impacted), and ensure that the agency’s actions are responsive to communities’ environmental justice concerns. These tools will be used as appropriate and consistent with federal law and in concert with existing best practices or analytic guidance when available.

Another step is to ensure consistency with the EPA’s [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis](#), which is being [updated](#) to reflect the latest state-of-the-science and to reflect priorities outlined in [EO 14096](#). The guidance offers recommendations and best practices for how analysts can evaluate environmental justice concerns for rulemakings.

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.

### Priority Actions

*To use environmental justice and equity screening tools:*

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<sup>33</sup> Executive Order 14096: Revitalizing Our Nation's Commitment to Environmental Justice for All (April 26, 2023). See <https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all>.

<sup>34</sup> Pursuant to a permanent injunction issued by the U.S. District Court for the Western District of Louisiana on August 22, 2024, the EPA will not impose or enforce any disparate-impact or cumulative-impact-analysis requirements under Title VI against any entity in the State of Louisiana. [Click here for additional information](#).

1. OEJECR will provide consultation, guidance, and best practices to the EPA's national programs and regions, governmental partners, and other organizations on the use of [EJScreen](#)—and other tools—to further efforts in addressing disproportionate and adverse effects in communities that are vulnerable, underinvested, and/or overburdened.
2. OEJECR will coordinate capacity-building and best practices for EPA staff with ongoing efforts, such as [EJScreen](#) training sessions as well as environmental justice and National Environmental Policy Act (NEPA) 309 Review office hours with the EPA Office of Federal Activities' NEPA Compliance Division. Additionally, the EPA's national programs and regions will provide ongoing training for EPA staff on uses of environmental justice and equity screening tools for different programmatic contexts and will embed the use of analytic tools into everyday work processes, as applicable.
3. OEJECR will continue to update [EJScreen](#) annually to reflect the newest available data, stay current with changing priorities, and incorporate changes based on user and expert feedback.
4. OEJECR will strengthen environmental justice and equity screening tools by working with internal and external experts to improve the scientific foundation upon which screening tools are built, ensure peer review of the critical elements, and use the best available science to guide the further development of these tools.

*To promote the agency's responsiveness to environmental justice concerns through rulemaking:*

1. The EPA Office of Policy (OP), ORD, OEJECR, and the EPA's national programs will work together to develop and implement approaches to integrate environmental justice analyses and/or cumulative impacts analyses early into the regulatory decision-making process to assess and ensure consideration of potential disproportionate and adverse effects.
2. OP will [update](#) the [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis](#) to reflect the current state-of-the-science, new peer-reviewed agency guidance, and new terminology, priorities, and direction (including terminology, priorities, and direction identified in [EO 14096](#)). OP will also provide consultation, training, and further direction on best practices to the EPA's national programs and regions for implementing the updated [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis](#).
3. The EPA national programs and regions will develop, implement, and/or use existing EPA guidance and procedures to conduct environmental justice analyses of agency rulemakings with environmental justice implications. To the maximum extent practicable, appropriate, and consistent with law, the EPA regulatory actions should assess and consider disproportionate and adverse effects existing prior to and resulting from proposed regulatory actions.

4. In the preamble of all significant EPA rulemakings with environmental justice implications, the EPA's national programs will discuss the potential applicability of [EO 14096](#) which may include (1) how environmental justice concerns were considered and (2) how the rule may or may not have addressed (reduced, eliminated, mitigated, prevented) disproportionate and adverse effects on communities with environmental justice concerns.<sup>35</sup>
5. The EPA's national programs will include language in the preamble of all significant EPA rulemakings, existing guidance document(s), and new guidance document(s) that reflects the civil rights obligations of the EPA's financial assistance recipients, where applicable.
6. The EPA's program offices and regions will incorporate meaningful engagement policies and practices when seeking ideas, data, input, feedback, and recommendations from the public to inform agency regulatory actions, as applicable. Furthermore, OEJECR will encourage and support the use of negotiated rulemaking by national programs, when appropriate, as one method for implementing the activities outlined above.

## Metrics

- ✓ Percentage of significant EPA actions with environmental justice implications that respond to environmental justice concerns and reduce or address disproportionate and adverse effects.<sup>36</sup>

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<sup>35</sup> Rules are determined to be significant under EO 12866 if they have a substantial effect on the economy, have implications for other agencies, or raise novel policy issues. See <https://www.epa.gov/laws-regulations/summary-executive-order-12866-regulatory-planning-and-review>.

<sup>36</sup> The EPA will address disproportionate and adverse impacts (effects) consistent with applicable laws and in alignment with [EO 14096](#).

## **Objective 2.3: Provide Meaningful Engagement Opportunities that Inform the EPA's Decision-Making.**

The EPA strives to increase the practice of meaningful engagement in critical decision-making by building upon the many ways that the EPA's national programs and regions currently seek ideas, input, feedback, and recommendations from the public to inform agency decisions. Meaningful engagement is used to describe how the agency will:

- ✓ Provide timely opportunities for members of the public to share information or concerns and participate in decision-making processes;
- ✓ Fully consider public input provided as part of decision-making processes;
- ✓ Seek out and encourage the involvement of persons and communities potentially affected by federal activities by:
  - Ensuring that agencies offer or provide information on a federal activity in a manner that provides meaningful access to individuals with limited English proficiency and is accessible to individuals with disabilities,
  - Providing notice of and engaging in outreach to communities or groups of people who are potentially affected and who are not regular participants in federal decision-making, and
  - Addressing, to the extent practicable and appropriate, other barriers to participation that individuals may face; and
- ✓ Provide technical assistance, tools, and resources to assist in facilitating meaningful and informed public participation, whenever practicable and appropriate.

One way the EPA is working to catalyze progress is institutionalizing current policies, guidance, and directives on meaningful engagement—including the [Achieving Health and Environmental Protection Through EPA's Meaningful Engagement Policy](#), which is an update to the EPA's 2003 Public Involvement Policy. The agency's updated Meaningful Engagement Policy incorporates best practices and lessons learned since the 1981 and 2003 versions of the policy for improved meaningful engagement techniques—including techniques that support the use of data and information collected via participatory science and [Indigenous Knowledge](#) to inform agency decision-making.

At the core of the agency's Meaningful Engagement Policy is the [EPA's Public Participation Model \("the Model"\)](#), which guides EPA staff through seven iterative stages for effective public participation in EPA's actions. These seven stages are:

1. Plan: Identify the EPA Action, Select a Level of Participation, and Secure Resources
2. Identify the Public and Segments of the Public
3. Consider Providing Technical or Financial Assistance to the Public

4. Provide Information and Outreach
5. Provide Opportunities for Public Consultation and Participation Activities
6. Review and Use Input and Provide Feedback to the Public
7. Evaluate and Report Public Participation Activities

The EPA's national programs and regions will develop meaningful engagement plans when planning for public input on an agency project or decision, when applicable. A meaningful engagement plan identifies the components of a well-designed process to involve the public in the agency's decision-making from planning the process, to designing and implementing communication materials and engagement activities, to reflecting how knowledge gained from meaningful engagement was used to inform the agency's work.

In support of meaningful engagement and inclusive resolution of disputes, the EPA will continue to use facilitation, mediation, and other related activities with stakeholders. Examples of this approach include facilitated dialogues, problem-solving workshops, and mediated discussions to help ensure equitable participation when EPA engages with stakeholders.

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.

## **Priority Actions**

*To practice meaningful engagement in the EPA's decision-making:*

1. OEJECR will provide trainings for OEJECR staff on meaningful engagement skills/capabilities and on implementing the EPA's updated [Meaningful Engagement Policy](#).
2. The EPA's national programs and regions will develop processes and procedures to institutionalize current meaningful engagement policies, guidance, and directives—including the EPA's updated [Meaningful Engagement Policy](#).
3. The EPA's national programs and regions will develop and implement meaningful engagement plans when seeking ideas, input, feedback, and recommendations from the public to inform an agency project or decision, as applicable. OEJECR will provide support to the EPA's national programs and regions to develop these meaningful engagement plans.

## **Metrics**

- ✓ Number of new meaningful engagement plans created for a specific agency project or decision that impacts communities with environmental justice concerns.

## **Objective 2.4: Ensure the EPA's Programs and Activities Consider External Civil Rights and Environmental Justice.**

Advancing civil rights compliance is an agency-wide responsibility and a critical means for the EPA to advance environmental justice and equity. Each of the EPA's national programs and regions will develop annual Environmental Justice and External Civil Rights Implementation Plans (EJECR IPs) to ensure that environmental justice considerations and civil rights compliance activities are integrated in the agency's decision-making, planning, guidance, policy directives, monitoring, and review activities. These EJECR IPs will include priorities areas such as working with communities, engagement with external partners, environmental justice and external civil rights integration, civil rights compliance, and cross-divisional (or other coordinated national and regional) activities.

Advancing environmental justice and equity also means that agency staff are responsible for identifying and eliminating barriers for the meaningful and equal access of all people—including persons with [limited English proficiency \(LEP\)](#) and persons with disabilities—in agency resources, activities, services, decisions, and programs. In addition to EJECR IPs, the EPA's national programs and regions will continue to develop and implement language assistance plans and procedures consistent with the [EPA's Order 1000.32 "Compliance with Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency."](#)<sup>37</sup>

OEJECR will also develop a Directive on [Section 504 of the Rehabilitation Act of 1973](#) and on the EPA's implementing regulation of [40 C.F.R. Part 12](#). This Directive will outline clear, consistent, and well-coordinated processes for ensuring equal access for persons with disabilities to the EPA's programs, services, and activities—which will include trainings and technical assistance to the EPA's national programs and regions as well as sharing information about resources that the EPA has in place to ensure consistent, agency-wide provisions of needed services (or “reasonable modifications”) for persons with disabilities.

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.

### **Priority Actions**

*To promote environmental justice and external civil rights considerations:*

1. In partnership with the EPA's national programs and regions, OEJECR will establish clear expectations for the development of annual Environmental Justice and External Civil Rights Implementation Plans (EJECR IPs) to integrate environmental justice considerations and civil rights compliance activities into all planning, guidance, policy directives,

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<sup>37</sup> This Order outlines the necessary steps for the agency to provide meaningful language access to persons with [limited English proficiency \(LEP\)](#), including the EPA's centrally administered LEP Language Services Contract.



monitoring, and review activities. Progress will be reported for each national program's and region's EJEER IPs, as applicable.

2. The EPA's national programs and regions will update (as appropriate) all applicable policy, guidance, and/or rulemaking documents to include both environmental justice directives and civil rights requirements when undergoing updates or as new documents are crafted.
3. The EPA Office of Chemical Safety and Pollution Prevention (OCSPP) will implement the recently updated [Procedures for Chemical Risk Evaluation Under the Toxic Substances Control Act \(TSCA\) rule](#), which strengthens the process for conducting risk evaluations on chemicals under TSCA. These improvements to OCSPP's processes will ensure a solid foundation for protecting the public from dangerous chemicals, including for workers and other individuals living in communities overburdened by pollution.
4. OLEM will review and update selected Superfund policy and guidance to integrate environmental justice considerations—such as updating internal criteria for the [Superfund National Risk-Based Priority Panel Process](#), implementing strategies that integrate environmental justice considerations in the [Superfund Site Assessment Process](#), and others, as appropriate.
5. OEJEER's Partnerships and Collaboration Division and EPA's Office of International and Tribal Affairs (OITA) will initiate actions to revise the [July 2014 Policy on Environmental Justice for Working with Federally Recognized Tribes and Indigenous Peoples](#) (Policy). This Policy is the cornerstone in the agency's commitment to strengthen engagement with Tribal governments and Indigenous peoples to focus on environmental justice issues.
6. The EPA will update its Tribal data sources in the [Enforcement and Compliance History Online \(ECHO\)](#) tool to provide better coverage of applicable locations throughout all communities across the country. This revamp will include updated language in the "help" section of the tool to provide more concise understanding of the Tribal environmental justice flag.

*To build staff skills and capacity:*

1. OEJEER will provide capacity-building and training resources to agency staff, communities, and external partners on what it means to consider environmental justice and what it means to comply with external civil rights requirements.
2. OECA will train its staff on the fundamentals of community engagement in enforcement and compliance work.
3. The EPA Office of Mission Support (OMS) will establish a regional partnership program to engage its staff in hands-on environmental justice work by providing support to existing outreach and initiatives in EPA Region 3.

*To advance meaningful access for persons with limited English proficiency (LEP):*

1. OEJECR is coordinating with the EPA's national programs and regions on the development of Limited English Proficiency plans (or Language Access Plans). The EPA's national programs and regions will implement (and put into practice) their specific language access plans and language assistance procedures, consistent with [EPA Order 1000.32 "Compliance with Executive Order 13166."](#)
2. OEJECR will provide trainings and technical assistance to support the implementation of Language Access Plans, including trainings on how to access the various services available to EPA staff for the provision of language services.
3. The EPA's national programs and regions will secure the language services necessary to provide "meaningful access" to the EPA's programs and activities for individuals with limited English proficiency—regardless of whether these programs and activities are in-person, hybrid, or virtual.
4. OLEM will partner with the U.S. Department of Homeland Security to improve the [National Response Center Hotline](#)'s accessibility for persons with limited-English proficiency.

*To advance equal access for persons with disabilities:*

1. OEJECR will implement a program to meet the EPA's regulatory obligation to provide equal access to the EPA's programs and activities for persons with disabilities.
2. OEJECR will develop a Directive on [Section 504 of the Rehabilitation Act of 1973](#) and on the EPA's implementing regulation of [40 C.F.R. Part 12](#) that outlines the procedures for ensuring equal access for persons with disabilities to the EPA's programs, services, and activities. This will also include OEJECR establishing a contract to provide reasonable modifications and/or auxiliary aids and services to ensure equal access to individuals with disabilities—such as Sign Language Interpretation, Cued Language Transliteration, and Computer Access Realtime Translation, and others.

## **Metrics**

- ✓ Percentage of the EPA's national programs and regions that have established environmental justice and external civil rights implementation plans.
- ✓ Percentage of the EPA's programs and regions that have implemented program and region-specific language assistance plans.
- ✓ Percentage of the EPA's programs and regions that have implemented program and region-specific disability access plans.

### Goal 3: Strengthen Civil Rights Enforcement to Protect Access to a Healthy Environment for All People

Robust enforcement of civil rights laws, along with environmental laws, strengthens the EPA's ability to advance environmental justice and address legacy pollution in communities, including communities that are vulnerable, underinvested, and/or overburdened.<sup>38</sup> Through vigorous enforcement of civil rights laws, the EPA holds recipients of the EPA's financial assistance accountable for engaging in practices to promote a clean, healthy environment for all people without regard to race, color, national origin, disability, sex, and age. Promoting a clean, healthy environment for all people includes:

- ✓ Reducing disproportionate and adverse burdens related to air pollutants and exposure to toxic chemicals,
- ✓ Assessing and cleaning up contaminated sites,
- ✓ Providing equitable access to clean and reliable water,
- ✓ Ensuring better health outcomes in impacted communities, and
- ✓ Increasing public participation in critical decision-making.

An effective civil rights compliance program creates accountability so that the actions, policies, and practices of applicants and recipients of federal financial assistance comply with all applicable civil rights requirements that prohibit discrimination on the basis of race, color, national origin (including limited English proficiency), disability, sex, and age in programs or activities that receive financial assistance from the EPA.<sup>39</sup>

To achieve this goal, the EPA aims to meet these two objectives.

- ✓ **Objective 3.1:** Increase the Timeliness and Effectiveness of Civil Rights Compliance Activities.
- ✓ **Objective 3.2:** Implement a Robust Affirmative Civil Rights Enforcement Program.

Several objectives previously mentioned in this EJ Strategic Plan also support the EPA's goal to "Strengthen Civil Rights Enforcement to Protect Access to a Healthy Environment for All People." These objectives include Objective 1.1, Objective 1.2, and Objective 2.4.

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<sup>38</sup> Pursuant to a permanent injunction issued by the U.S. District Court for the Western District of Louisiana on August 22, 2024, EPA will not impose or enforce any disparate-impact or cumulative-impact-analysis requirements under Title VI against any entity in the State of Louisiana. [Click here for additional information.](#)

<sup>39</sup> EPA's [2023 Equity Action Plan](https://www.epa.gov/environmentaljustice/equity-action-plan): <https://www.epa.gov/environmentaljustice/equity-action-plan>

### **Objective 3.1: Increase the Timeliness and Effectiveness of Civil Rights Compliance Activities.**

Through OECRC, the EPA enforces several federal civil rights laws—including Title VI of the Civil Rights Act of 1964—through its implementation of nondiscrimination regulations.<sup>40</sup> Together, these laws prohibit discrimination on the basis of race, color, national origin (including limited-English proficiency), disability, sex, and age—as well as intimidation and retaliation—by recipients of EPA’s financial assistance.

The EPA will continue to strengthen the agency’s external civil rights program and the agency’s ability to enforce federal civil rights laws. This means continuing to implement the EPA’s authority to conduct pre-award reviews, investigations, compliance reviews and audits, other compliance and enforcement activities, issue policy guidance, and secure timely and effective resolutions to address allegations of discrimination.

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.

#### **Priority Actions**

1. OECRC will increase its dedicated civil rights workforce and contract support to conduct timely and effective complaint investigations and resolution of complaints.
2. OECRC will promote transparency and timeliness by posting publicly available documents about 1) civil rights complaints received, 2) compliance reviews initiated, and 3) compliance reviews resolved. OECRC will do this, for example, by posting informal resolutions and voluntary compliance agreements through the agency’s [External Civil Rights Docket](#).
3. OECRC will strengthen federal interagency collaboration and coordination on complaints, compliance reviews, and policy guidance—including strengthening federal interagency collaboration and coordination through the Title VI and Environmental Justice Coordinating Meetings Working Group or the Language Access Working Group with the U.S. Department of Justice.
4. OECRC will enhance the informal resolution process and increase opportunities for complainants and communities to participate in resolving complaints through OECRC’s established partnership with the EPA Conflict Prevention and Resolution Center (CPRC).

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<sup>40</sup> Title VI, 42 U.S.C. § 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. “Title VI of the Civil Rights Act of 1964,” United States Department of Justice: <https://www.justice.gov/crt/fcs/TitleVI#:~:text=Title%20VI%2C%2042%20U.S.C.,activities%20receiving%20federal%20financial%20assistance>.

## Metrics

- ✓ Increase in the percentage of cases that utilize forms of informal resolution (informal resolution, informal resolution plus, and alternative dispute resolution).

## **Objective 3.2: Implement a Robust Affirmative Civil Rights Enforcement Program.**

Federal civil rights laws authorize agencies—such as the EPA—to enact rules, regulations, or orders to achieve the laws’ objectives. The EPA’s non-discrimination regulation provides that EPA may conduct affirmative compliance reviews of recipients of the EPA’s financial assistance to ensure compliance with federal civil rights laws.<sup>41</sup> The agency is pursuing a more robust and effective civil rights compliance program to achieve this mandate, which includes compliance reviews, pre-award reviews, and post-award audits to ensure compliance with all applicable requirements, such as procedural safeguards requirements, as well as public education and technical assistance.

For example, OEJECR will continue to initiate reviews of applicants requesting financial assistance from the EPA. All applicants and recipients requesting financial assistance from the EPA must complete a Pre-Award Compliance Review Report ([Form 4700-4](#)), which requires applicants and recipients to provide the EPA with civil rights compliance information such as information on any pending civil rights lawsuits and administrative complaints filed under federal law against the applicant or recipient that allege discrimination based on race, color, national origin, sex, age, or disability. OEJECR will review the information provided on the Form 4700-4 to determine whether it is consistent with applicable EPA non-discrimination regulation requirements. Through a [Process and Criteria for Selecting Form 4700-4 for Audit](#), OEJECR will also prioritize and conduct post-award audits of the information submitted on the Form 4700-4.

To fulfill this objective, the agency has set forth priority actions and metrics to guide this effort.

### **Priority Actions**

1. OEJECR will work with the EPA Office of Grants and Debarment (OGD) and the EPA’s regions to implement, consistent with applicable law, the EPA’s Pre-Award Review (Form 4700-4 review) process—including “four-corners review” of the Form 4700-4—to determine whether the answers are filled out completely and are consistent with the regulatory non-discrimination requirements. OEJECR will enter into six-month agreements with applicants to correct regulatory deficiencies identified during Form 4700-4 review process.<sup>42</sup>
2. OEJECR will coordinate with the EPA’s regions to conduct, consistent with applicable law, post-award audits based on a sampling of submitted Form 4700-4 forms to ensure

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<sup>41</sup> Pursuant to a permanent injunction issued by the U.S. District Court for the Western District of Louisiana on August 22, 2024, EPA will not impose or enforce any disparate-impact or cumulative-impact-analysis requirements under Title VI against any entity in the State of Louisiana. [Click here for additional information.](#)

<sup>42</sup> “Four corners review” is a legal concept that means not looking at information outside of the form.

financial assistance recipients have the required federal civil rights regulatory requirements in place, as identified on Form 4700-4.

3. OEJECR will, consistent with applicable law, conduct and complete compliance reviews to determine compliance with Title VI of the Civil Rights Act of 1964, as well as other federal civil rights laws and the EPA's non-discrimination regulation in each fiscal year going forward, as resources allow. The EPA's regions will assist OEJECR in conducting these compliance reviews with respect to programs identified in particular states within the respective regions.
4. With input from the EPA's national programs and regions, OEJECR will develop a plan to initiate a target number of regularly planned compliance reviews each year, consistent with the EPA's [Process and Criteria for Prioritizing and Selecting Affirmative Compliance Reviews](#) and applicable law. The EPA's national programs and regions will also assist OEJECR in identifying programs for potential compliance reviews.

## Metrics

- ✓ Increase in the number of proactive post-award civil rights compliance reviews initiated to address discrimination issues affecting environmentally overburdened and underserved communities.
- ✓ Increase in the number of civil rights audits initiated annually to advance compliance with procedural requirements.<sup>43</sup>
- ✓ Number of applicants that entered into a six-month agreement and satisfied the terms of the agreement.

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<sup>43</sup> This metric tracks the annual number of post-award audits of Form 4700-4 forms initiated.

## Public Comment and Tribal Consultation

Engaging with federal, Tribal, territorial, state, and local governments, as well as the agency's many partners and stakeholders is an integral part of the EPA's strategic planning process. In addition to participating in federal interagency listening sessions on strategic planning, the EPA's EJ Strategic Plan is informed by the engagement and processes the agency used to develop the [FY 2022 – FY 2026 EPA Strategic Plan](#), the EPA's 2023 [Equity Action Plan](#), and the agency's [FY 2025 – 2026 National Program Guidances](#)—which includes each document's respective community and stakeholder engagements, as well as consultation with federally recognized Tribes.

### 2024 Listening Sessions on Federal Agencies' Strategic Planning

In Spring and Summer 2024, the EPA participated in three federal interagency listening sessions with the White House Council on Environmental Quality and with other federal agencies to seek further input on topics, issues, and ideas that federal agencies should consider in their respective environmental justice strategic plans. These sessions were held with members of National Congress of American Indians (NCAI) at their 2024 Executive Council Winter Session, with attendees of the 2024 National Environmental Justice Conference and Training Program, and with attendees at a webinar hosted by the World Resources Institute.

Key themes/topics raised during these listening sessions included:

- ✓ **Meaningful engagement means meeting people where they are.** Each individual—and community—with environmental justice concerns has their own unique needs and visions for advancing environmental justice. Federal agencies should develop and implement meaningful engagement opportunities and capacity-building resources that consider and meet these unique experiences. This also means developing and implementing meaningful engagement practices where people are (and feel) safe and valued to participate in opportunities to inform agency decision-making. For example, members attending the listening session with NCAI emphasized the need for federal agencies to consider and respect wholistic value systems of Indigenous Peoples.
- ✓ **Acknowledge issues and impact.** If issues arise, acknowledge them and explore alternative solutions that meet the goals of the project.
- ✓ **Meaningful engagement is not a one-stop-shop or process.** Processes for meaningful engagement are just as much a process of building trust as they are a process of collecting input. Federal agencies should not expect individuals to be fully prepared or informed to participate in agency decision-making if the agency has not previously engaged with the audience or stakeholders beforehand. Federal agencies should plan adequate time for meaningful engagement, comment,



and/or consultation where people have the tools and capacity to meaningfully participate in agency decision-making and where people are confident that their voices, choices, actions, experiences, and expertise will be reflected in agency's actions. For example, at the listening session with NCAI, NCAI members shared that they would like to see federal agencies commit to better (and earlier) engagement with Tribes. NCAI members also emphasized that Tribes should not be involved just at the mitigation stage when problems have already developed.

- ✓ **Providing capacity-building resources to support change at the community-level.** Federal agencies should distribute resources directly to communities and dedicate specific portions of funds—such as funding from BIL and IRA—for resources that can help individuals with their applications. Providing capacity-building resources should also include providing free and accessible technical assistance to communities during the grant application and reporting process. Thorough public engagement is important to ensure that these capacity-building resources reach the communities they intend to support—such as holding local engagement sessions in local venues, offering engagement sessions in multiple languages, providing information in plain-language, etc.
- ✓ **Proactive interagency coordination.** Communities with environmental justice concerns often face barriers to accessing the multiple funding or technical assistance programs provided by a federal agency—let alone the complimentary funding or technical assistance programs provided across the federal family. Proactive coordination between federal agencies—and their funding or technical assistance programs—is key to alleviate the burden on already capacity-constrained communities to navigate multiple funding and technical assistance opportunities.

## Public Comment and Tribal Consultation from Previous Planning Processes

Outreach and engagement during the EPA's previous environmental justice strategic planning process include [the EPA issuing a Federal Register notice](#) and using [regulations.gov](#) to encourage the public to share feedback on the draft [FY 2022 – FY 2026 EPA Strategic Plan](#). The EPA sent notification of the available draft [FY 2022 – FY 2026 EPA Strategic Plan](#) to partner and stakeholder organizations. Additionally, the agency consulted with Tribal governments and engaged with Congress and Federal Advisory Committees—including presentations and public meetings with the National Environmental Justice Advisory Council (NEJAC).

Throughout the process of updating the EPA's 2023 [Equity Action Plan](#), the agency sought input from the public, key stakeholders, Federal Advisory Committees (such as the NEJAC), and agency senior leads.

To inform the development of its [FY 2025 – FY 2026 National Program Guidance \(NPG\)](#), OEJECR conducted early outreach to different stakeholder groups. OEJECR joined a virtual business meeting with the NEJAC to provide information about the NPG planning process. OEJECR also facilitated virtual engagements with state, community, and Tribal partners to review potential NPG updates and to solicit feedback on targeted questions for each stakeholder group. The results of OEJECR’s early engagement process are highlighted in a [summary document](#). When developing and finalizing the [FY 2025 – 2026 National Program Guidances](#), the EPA also sought and considered feedback that the agency received from its public comment and Tribal consultation.<sup>44</sup>

## Informing (and developing) the EPA’s EJ Strategic Plan

Considering the topics, issues, and ideas that were raised during all of the concerted outreach and engagement mentioned above, the agency has taken steps to incorporate this input into the EPA’s EJ Strategic Plan. This includes developing the EJ Strategic Plan to describe:

- ✓ **Actions to promote interagency collaboration and provide capacity-building resources directly to communities**—such as actions identified in Objective 1.1: Build Capacity and Climate Resilience in Communities that are Overburdened and Underinvested.
- ✓ **Actions to ensure the meaningful engagement of all people in the agency’s programs, activities, and decision-making**—such as policies and actions identified in Objective 2.3: Provide Meaningful Engagement Opportunities that Inform the EPA’s Decision-Making.
- ✓ **Actions to use participatory science and bring the EPA’s science into alignment with the needs and values of local communities—including communities that are vulnerable, underinvested, and/or overburdened**—such as efforts acknowledged in EPA’s “Overall Approach to Advancing Environmental Justice” or actions identified in Objective 2.2: Incorporate Tools and Environmental Justice Analyses that Identify and Address Disproportionate and Adverse Effects in the EPA’s Decision-Making.

As appropriate, the corresponding goals, objectives, strategies, performance measures, and activities from the [FY 2022 – FY 2026 EPA Strategic Plan](#), the EPA’s 2023 [Equity Action Plan](#), and the [FY 2025 – 2026 National Program Guidances](#) are referenced and incorporated in this EJ Strategic Plan.

The EPA continues to seek to understand what matters most to the agency’s federal, Tribal, territorial, state and local government partners, communities, non-governmental organizations,

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<sup>44</sup> To see response to comments for each program’s FY 2025 – 2026 National Program Guidance, see <https://www.epa.gov/planandbudget/national-program-guidances-npgs>.

and other interested parties as the EPA works to achieve its mission to protect human health and the environment. As the agency implements the identified goals, objectives, priority actions and metrics in the EPA's EJ Strategic Plan, the agency will continue to seek input and recommendations from all interested parties on how the EPA can improve its programs, policies, and activities to achieve meaningful environmental and human health improvements in communities with environmental justice concerns.

To receive information on upcoming meaningful engagement, public comment, and/or consultation opportunities with OEJECR, individuals are encouraged to subscribe to OEJECR's listserv by sending a blank email to: [join-epa-ej@lists.epa.gov](mailto:join-epa-ej@lists.epa.gov).

## Appendix: Summary of EPA's EJ Strategic Goals, Objectives, and Metrics

Goal 1: Promote Environmental Justice and Civil Rights at the Federal, Tribal, State, Local, and Community Levels.	
<b>Objective 1.1:</b> Build Capacity and Climate Resilience in Communities that are Overburdened and Underinvested.	<ul style="list-style-type: none"> <li>✓ Percentage of the EPA's national programs and regions that provide capacity-building resources to communities with environmental justice concerns to improve how the public's feedback and comments inform the agency's decision-making process.</li> <li>✓ Number of technical assistance services delivered by the EJ TCTACs which include, but are not limited to, services related to capacity-building, outreach and engagement, and grants.</li> <li>✓ Number of new community-driven partnerships working collaboratively to implement change-making projects on the ground in communities.</li> <li>✓ Total funding for grant resources flowing to disadvantaged communities from Environmental and Climate Justice programs covered under the Justice40 Initiative.</li> <li>✓ Number of lead service line replacements funded in disadvantaged communities (as defined by states).</li> <li>✓ Number of information sharing sessions and outreach and technical assistance events held with overburdened and/or underserved communities and environmental justice advocacy groups on environmental justice and civil rights issues.</li> </ul>
<b>Objective 1.2:</b> Engage and Support Tribes and Federal, State, and Local Governments to Achieve Results in Communities.	<ul style="list-style-type: none"> <li>✓ Number of lead service line replacements funded in disadvantaged communities (as defined by states).</li> <li>✓ Percentage of required civil rights procedural safeguard elements implemented by state permitting agencies that are recipients of the EPA financial assistance.</li> <li>✓ By September 30, 2026, the EPA will increase by 40% the number of the EPA Office of Research and Development (ORD) activities related to environmental justice that involve or are applicable to Tribes, states, territories, local governments, and communities.               <ul style="list-style-type: none"> <li>a. Each year, the EPA will increase by an average of 10 percent from the baseline year (FY 2022) the number of ORD activities related to environmental justice that involve communities or are designed to be applicable to Tribes, states, territories, local government, and communities.</li> <li>b. Percentage of the ORD's environmental justice-related research products meeting partner needs.</li> </ul> </li> </ul>

Goal 2: Embed Environmental Justice and External Civil Rights into the EPA's Programs, Policies, and Activities.	
<b>Objective 2.1:</b> Advance Measurable Environmental and Public Health Improvements in Communities that are Vulnerable, Underinvested, and/or Overburdened	<ul style="list-style-type: none"> <li>✓ The EPA will develop (or will continue to develop) indicators to identify disparities in environmental and public health conditions.</li> <li>✓ Number of actions which advance consideration of multiple, disproportionate, and/or cumulative impacts, including decisions informed by such consideration. Actions can include facilitating discourse on emerging approaches, tools, and promising practices; developing and applying methods and tools; conducting research projects; building expertise, consensus, and capacity; improving cross-program, cross-agency, and multi-stakeholder engagements.</li> </ul>
<b>Objective 2.2:</b> Incorporate Tools and Environmental Justice Analyses that Identify and Address Disproportionate and Adverse Effects in the EPA's Decision-Making.	<ul style="list-style-type: none"> <li>✓ Percentage of significant EPA actions with environmental justice implications that respond to environmental justice concerns and reduce or address disproportionate and adverse effects.</li> </ul>
<b>Objective 2.3</b> Provide Meaningful Engagement Opportunities that Inform the EPA's Decision-Making.	<ul style="list-style-type: none"> <li>✓ Number of new meaningful engagement plans created for a specific agency project or decision that impacts communities with environmental justice concerns.</li> </ul>
<b>Objective 2.4:</b> Ensure the EPA's Programs and Activities Consider External Civil Rights and Environmental Justice.	<ul style="list-style-type: none"> <li>✓ Percentage of the EPA's national programs and regions that have established environmental justice and external civil rights implementation plans.</li> <li>✓ Percentage of the EPA's programs and regions that have implemented program and region-specific language assistance plans.</li> <li>✓ Percentage of the EPA's programs and regions that have implemented program and region-specific disability access plans.</li> </ul>
Goal 3: Strengthen Civil Rights Enforcement to Protect Access to a Healthy Environment for All People.	
<b>Objective 3.1:</b> Increase the Timeliness and Effectiveness of Civil Rights Compliance Activities.	<ul style="list-style-type: none"> <li>✓ Increase in the percentage of cases accepted for investigation that utilize forms of informal resolution (informal resolution, informal resolution plus, and alternative dispute resolution).</li> </ul>
<b>Objective 3.2:</b> Implement a Robust Affirmative Civil Rights Enforcement Program.	<ul style="list-style-type: none"> <li>✓ Increase in the number of proactive post-award civil rights compliance reviews initiated to address discrimination issues affecting environmentally overburdened and underserved communities.</li> <li>✓ Increase in the number of civil rights audits initiated annually to advance compliance with procedural requirements.</li> <li>✓ Number of applicants that entered into a six-month agreement and satisfied the terms of the agreement.</li> </ul>