

Environmental Justice Draft Action Plan Office of Research and Development

The Office of Research and Development's Mission:

To conduct leading-edge research and foster the sound use of science and technology to fulfill EPA's mission to protect human health and safeguard the natural environment.

Overview

The Environmental Protection Agency's mission is to protect human health and to safeguard the natural environment—air, water, and land—upon which life depends. The Office of Research and Development (ORD) supports this overarching mission by providing EPA and all Americans with the knowledge needed to make informed decisions about risks to human health and the environment. ORD provides the scientific foundation for EPA's regulatory programs and decisions, assesses the state of the environment, identifies new issues of potential concern, and

provides information and tools to customers and stakeholders to support risk-based decisions based on sound science.

ORD's Customers and Stakeholders

ORD's *customers* are those who directly use ORD's research products and technical assistance to protect human health and safeguard the environment. ORD's primary customers are EPA's program and regional offices but also include state environmental agencies, tribal organizations and the environmental science community.

ORD's *stakeholders* are those individuals or organizations with a specific interest in ORD's work and accomplishments. This larger set includes industry, trade associations, the academic research community, public interest groups, environmental justice communities, and in the broadest sense, the American people. Some stakeholders may also be customers.

In 1994, the signing of Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," brought the issue of environmental justice to greater national attention and with it, a commitment from government to effectively level the playing field for minority and disadvantaged communities by ensuring their equal protection under our environmental laws and regulations. The order required all federal agencies to develop programs and strategies that would protect these often marginalized and disenfranchised communities. Simultaneously, several federal agencies sponsored a national symposium on the health and research needs to meet the goal of

environmental justice (EJ). Recognizing the importance of cooperation and collaboration to address these issues, an interagency consortium was formed that included the National Institute of Environmental Health Sciences, Centers for Disease Control and Prevention, the Environmental Protection Agency, and the Department of Energy. The consortium then requested the Institute of Medicine to conduct an independent study of EJ health research, education and policy needs. The report entitled, "Toward Environmental Justice: Research, Education and Health Policy Needs," recommended public health and environmental research be the central focus of the consortium's efforts in order to adequately address environmental justice. Further, the IOM formulated the following three principles that align very well with ORD's current and future approaches to research on environmental justice issues. (See Box 1-1.)

Box 1-1
**Three Principles for Public Health
Research to
Address Environmental Issues**

- 1. Improve the science base.** More research is needed to identify and verify environmental etiologies of disease and to develop and validate improved research methodologies.
- 2. Involve the affected populations.** Citizens from the affected population in communities of concern should be actively recruited to participate in the design and execution of research.
- 3. Communicate the findings to all stakeholders.** Researchers should have open, two-way communication with communities of concern regarding the conduct and results of their research activities.

*Toward Environmental Justice: Research, Education
and Health Policy Needs (1999)*

On August 9, 2001, EPA Administrator Christine Todd Whitman issued an Agency-wide memorandum reaffirming the Agency's continued commitment to Environmental Justice, calling for its integration into all programs, policies, and activities. In response, the Office of Environmental Justice issued a memorandum and guidance document to assist EPA's regional and headquarters offices in the development and implementation of strategies and activities to support EPA's environmental justice goals. ORD shares this commitment to Environmental Justice as evidenced by ORD's efforts to serve as a leading-edge researcher, advisor, interpreter and communicator of scientific information about human health and ecological risks.

Through the work in its labs, centers and offices, ORD addresses environmental justice concerns,

either directly or indirectly, in its research program and when providing expert advice and scientific leadership in the development of Agency science policies. ORD further supports the Agency's EJ goals of equal protection in its role as the co-Designated Federal Official to the NEJAC Health and Research Subcommittee (HRS) along with the Office of Prevention, Pesticides and Toxic Substances OPPTS). The HRS plays a pivotal role in helping EPA meet its expectations toward achieving environmental justice. The advice and recommendations provided by the HRS feed into three ORD work areas where community-based health and science needs can be considered in the most meaningful way: research planning, program and decision support, and science policy.

Purpose

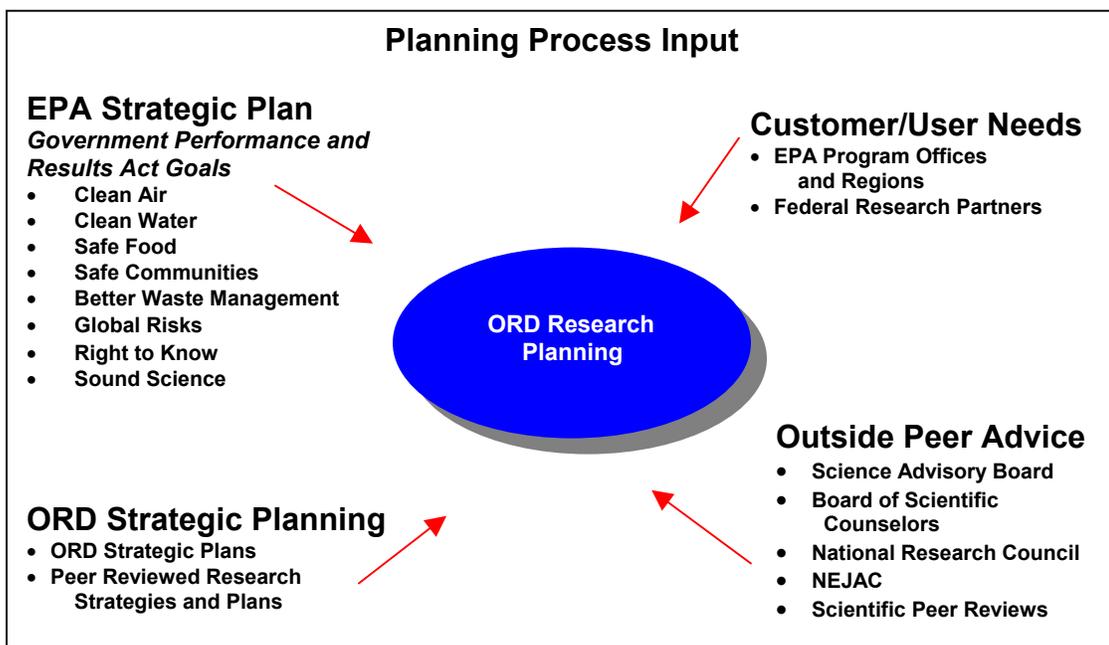
The purpose of this plan is to identify, develop, and communicate strategies and activities ORD is currently engaged in, and intends to engage in, to support the Agency's environmental justice goals and objectives. ORD recognizes the plan to be a living document that will afford flexibility to adapt and change strategies to achieve the most effective results.

Opportunities to Encourage Participation

There are many ways in which ORD brings environmental justice considerations to bear on the work of its labs and centers. These can best be demonstrated by describing ORD's three primary work areas that also serve as the basis for the EJ action plan goals:

- Research Planning
- Program and Decision Support
- Science Policy

Category 1: Research Planning – ORD employs a comprehensive approach to assessing EPA’s research needs and advancing environmental science. This includes a research planning process that draws on multiple sources to create a robust program that produces research results that address the health issues of disproportionately affected communities. In particular, the Research Coordination Teams (RCTs) serve as the primary source for consultation and communication on media research issues with parties within and outside EPA. The RCTs assess research needs, recommend programmatic priorities, monitor progress toward meeting commitments to produce research products, facilitate integration of intramural and extramural research activities, and ensure communication of research results. For environmental justice, this means that the scientific issues of the programs and Regions regarding disadvantaged populations are factored into the planning and implementation of ORD’s research program.



In FY 2003 and beyond, ORD will:

- Designate an EJ coordinator for each lab and center
- Design and implement a one- or two-day training module for all ORD employees that will include EJ case studies, risk communication and risk management lessons
- Explicitly consider environmental justice concerns in its planning processes and develop EJ guidance for use by the RCTs to ensure EJ concerns are considered
- Consider recommendations on EJ science and research needs from the Health and Research Subcommittee as part of the planning process
- Ensure all directors are aware of, and consider, environmental justice concerns in their individual planning processes for each lab and center (through discussions with ORD’s Science and Executive Councils)

- Continue to encourage research to better determine the biological bases for racial/ethnic and socio-economic differences (i.e., Minority Institution Based Centers, Science to Achieve Results Grants, Genomics)
- Refine exposure scenarios that better reflect geographic differences (i.e., urban vs. rural settings)
- Gain a better understanding of cultural factors that influence environmental health
- Continue to co-chair the Tribal Science Council

Category 2: Program Support - ORD works with EPA's program and regional offices to provide information and expert judgment on scientific issues that may arise during Agency regulatory activities. The main goal of the program support function is to constructively advise the programs and regions on using the best available scientific information--including that related to EJ concerns--during the development of regulations, policies, and guidance. Teams of ORD scientists identify potentially significant scientific issues and determine the appropriate extent of ORD participation. Each team then addresses the identified issues in its advice to the programs. Concurrently, program support staff foster a trusting and cooperative relationship between ORD, the program and regional offices by promoting effective and reliable communication. Through these efforts, the program support staff help to ensure that ORD provides timely, value-added input and speaks with one clear voice at the appropriate time in the regulatory review process.

In FY 2003 and beyond, ORD will:

- Ensure Program Support staff is properly trained on matters related to consideration of environmental justice in research and regulatory activities
- Ensure Program Support staff are aware of, and communicate appropriately, the latest scientific information relative to environmental justice concerns in the context of the regulatory development process (regulatory “blueprint” formulation)
- Develop guidance for program support staff to encourage consideration of EJ

Category 3: Science Policy – With a goal of integrating policies that guide Agency decision makers in how to use of scientific and technical information, the Science Policy Council (SPC) works to implement and ensure the success of selected initiatives recommended by external advisory bodies such as the National Research Council and the Science Advisory Board, as well as Congress, industry, environmental groups, and Agency staff. In this way, the SPC contributes to guidance development for selected EPA regulatory and enforcement policies and decisions that go beyond regional and program boundaries. The Science Advisor to the Agency chairs the SPC, which is composed of senior managers from EPA programs, regions, and laboratories supported by staff. The SPC staff works closely with the HRS. For instance, the HRS is currently reviewing two science policy documents, the Contaminated Sediments Science Plan and the Framework for Cumulative Risk, to determine whether environmental justice concerns are being met and to identify any outstanding science needs.

Also under the auspices of the SPC is the EPA Science Inventory. The Science Inventory is an important tool in the development of cross-Agency science plans for such issues as contaminated sediments or projects that may have EJ implications. The inventory, accessible by all Agency employees, is a searchable database containing science activity data from across the Agency and can be used to identify and track EJ-related science activities.

In FY 2003 and beyond, ORD will:

- Continue to solicit input from NEJAC on matters of environmental justice in the development of science policy guidance documents
- Use the Science Inventory as a tool for identifying and tracking EJ related science activities across the Agency

Public Involvement

ORD is committed to actively seeking out opportunities to communicate findings and consult with affected communities on problems requiring scientific investigation.

The checked items indicate ways ORD is currently utilizing the prescribed techniques outlined in the OEJ guidance document (see table). ORD will evaluate its progress in this area to foster even greater public participation.

Of the non-required activities, ORD routinely has meetings with stakeholders prior to the issuance of guidance documents to obtain their feedback on proposed risk assessment and risk management activities. As for engaging in previously untested activities, ORD sees a potential role for focus groups in the evaluation of training and risk communication materials ORD develops for its employees.

Techniques to Achieve Meaningful Public Involvement	
<u>Required Public Participation Activities</u>	
<u>Disseminating Information</u>	
✓	Public Notice
✓	Mailing Lists
✓	Fact Sheets/Statement of Basis
✓	Response to Comments
✓	Information Repositories
<u>Gathering and Exchanging Information</u>	
✓	Public Comment Periods
✓	Contact Persons
✓	Public Meetings
✓	Public Hearings
<u>Non-required Public Participation Activities</u>	
<u>Disseminating Information</u>	
•	Translation
•	Project Newsletters and Reports
•	Introductory Notices
•	Exhibits
•	Briefings
•	Facility Tours
•	News Releases and Press Kits
•	News conferences
<u>Gathering and Exchanging Information</u>	
•	Focus Groups
•	Door-to-Door Canvassing
•	Surveys and Telephone Polls
•	Telephone Contacts
•	Telephone Hotlines
•	On-Scene Information Offices
•	Question and Answer Sessions
•	Information Tables
•	Meetings with Stakeholders
•	Availability Sessions/Open Houses
Environmental Justice Action Plans - Attachment C (2002)	

Attachment A

DRAFT ENVIRONMENTAL JUSTICE STRATEGIES AND ACTIVITIES MATRIX

GOAL #1: To ensure that environmental justice is a key consideration in strategic planning and operational planning efforts, and that all managers and staff understand the concept of environmental justice and are given the support and resources to integrate environmental justice in their day-to-day, programmatic responsibilities.

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Lead Contact
1. Lab/Ctr./Office adoption of action plan	1a. Distribute plan with memo from Bill Farland seeking concurrence; solicit names for EJ Coordinators	04/01/03	Plan adopted	0.1 FTE per lab/center	Brenda Washington, EJ Coordinator ORD (202) 564-6781
2. Designate an EJ Coordinator for each lab and center	2a. Identify EJ coordinators in each lab/center in response to Farland memo	04/01/03	EJ Coordinators identified for each lab/center	0.1 FTE per lab/center	Brenda Washington, EJ Coordinator ORD (202) 564-6781
3. Integrate EJ into the research planning process	3a. Brief HRS on research planning process 3b. Solicit and consider input from HRS on EJ science and research needs as part of the planning process	3a. 01/31/03 3b. Ongoing	Briefing held	0.1 FTE	Paul Zielinski, Chief, Planning Staff ORD (202) 564-6772

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Lead Contact
4. Design and implement training for all ORD employees	4a. Meet with Lab/Center Directors 4b. Develop module 4c. Train the trainers 4d. Train staff	4a. 06/01/03 through 4f. 05/01/04	Number of employees trained	0.1 FTE per lab/center	Meeting: Brenda Module: Brenda Trainers: L/C/O Training: L/C/O
5. Develop tools to assist ORD employees	5a. Develop one-pager on “rules of the road” for integrating EJ into planning	5a. 06/01/03	Guidance completed; distributed at training	0.1 FTE	Brenda Washington, EJ Coordinator, ORD (202) 564-6781

GOAL #2: To ensure environmental justice is a consideration in program support functions in the context of the regulatory development process and that all program support managers and staff understand the concept of environmental justice and are given support and resources to integrate environmental justice in their day-to-day responsibilities.

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Lead Contact
1. Integrate EJ into program support function	1a. Train program support managers and staff 1b. Brief HRS on Program Support functions	1a. 10/01/03 1b. 01/31/03	Number of employees trained	0.1 FTE	Training: OSP Briefing: Connie Bosma, Chief, Program Support ORD (202) 564-6773
2. Develop tools to assist ORD employees	2a. Develop one-pager on “rules of the road” for integrating EJ in program support functions	2a. 01/31/04	Guidance completed; distributed at training	0.1 FTE	Brenda Washington, EJ Coordinator, ORD (202) 564-6781

GOAL #3: To ensure environmental justice is a consideration in the development science policies and guidance documents and that all managers and staff understand the concept of environmental justice and are given support and resources to integrate environmental justice in their day-to-day responsibilities.

Strategies	Activities	Duration/ Due Date	Performance Measures	Resources (FTE/\$)	Lead Contact
1. Integrate EJ into science policy and guidance development	1a. Train science policy staff 1b. Solicit and consider input from HRS	1a. 10/01/03 1b. Ongoing	Number of employees trained	0.1 FTE	Training: OSP HRS input: Science Policy Staff
2. Develop tools to assist ORD employees	2a. Initiate use of the Science Inventory as a tool to track EJ-related science activities	2a. 06/30/03	Inventory tracking system in place	0.1 FTE	Ken Sala, Project Leader, ORD (202) 564-6779