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Subject: Comments Draft EJ 2020 Action Agenda Framework--Particular Application to Montana Office of EPA
Attachments: Environmental Justice and Butte Priority Soils.docx; Environmental Justice and Butte Priority Soils.docx; Environmental Justice and Butte Priority Soils--RMAP.docx; Butte Health Study Ignores Environmental Justice Issues.docx

Flag: Follow up

I would like to offer the following comments on the Draft EJ 2020 Action Agenda Framework.
I would offer the following summary comments:

1. While concern for promoting environmental justice should permeate all of EPA's activities, often specific actions to promote environmental justice are not part of EPA activities. I would recommend that as part of any EPA action (for example, to remediate a site under Superfund), there be developed a specific, concrete and detailed action plan for promoting environmental justice. (Of course, this recommendation would pertain only to sites where there was a specific environmental justice community.) In Butte, Montana, for example, there is a Superfund site in the middle of town called central Butte. This area has a disproportionate number of low-income citizens and so is an environmental justice community. The Montana Office of EPA has never addressed environmental justice concerns in this area. Either the Montana Office of EPA doesn't know what is environmental justice or they choose to ignore the mandate in any effective way.

2. The Draft has lofty goals and ideals but lacks specifics. It expresses pious sentiments. On the ground, when EPA acts pursuant to a plan of action that plan of action needs a specific, concrete, measurable and definitive environmental justice component.

3. When doing health risk assessments, EPA needs to give specific consideration to environmental justice communities. For example, for various reasons, low-income citizens are more prone to the effects of exposure to toxics than are the non-poor. Yet, traditional health risk assessment fails to take this into account.

4. Specific, concrete and measurable outreach activities for reaching environmental justice communities should be a part of all EPA plans.

5. Specific, concrete and measurable activities to include environmental justice communities should be a part of all EPA plans. In Montana, the Montana Office of EPA has, de facto, adopted a one size fits all approach to environmental justice activities. Ways of communicating or including, for example, non-poor citizens may not work with low income citizens. Yet, the Montana Office makes no special effort to include environmental justice communities. The one size fits all approach doesn't work when it comes to environmental justice activities.

6. Certainly, in Montana, there should be training provided to make the Montana Office of EPA more sensitive to environmental justice issues.

7. The evaluation of all EPA activities should include a specific environmental justice component.

Of course, all of the above would only apply if there was an environmental justice community affected by EPA activities.

I have **attached** additional comments I would like to submit. One was prepared a while back, as the remediation plan for Butte Priority Soils was being developed, but, the arguments still apply today.

Please consider these attachments as input and comment on the Draft 2020 Action Agenda

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