**Attachment A: Potential Tools and Recommendations**

This draft, initial list contains tools and recommendations (templates, guidance, best practices, policy decisions, trainings, case studies, websites and other specific resources) that the EJ and Permitting Workgroup is considering for development to better integrate environmental justice into the permitting process and into permit conditions.

**Public Involvement/Communication**

* Environmental Justice Public Participation Plan/Guidelines/Best Practices (these may include step-by-step guidance to promote effective public engagement in the permitting process, including pre-application meetings, advanced notification, periodic engagement mechanism to inform communities of project changes, and recommendations on how to make public notification more effective)
* Environmental Justice Public Participation Fact Sheet/Website
* Environmental Justice Public Participation Outreach Template (perhaps as part of a permit application)
* Web-based/searchable contact lists, by EPA region, of community organizations and tribal government and indigenous organizations to ease outreach
* Guidance on developing communication protocols with EJ communities that reflect the communities’ preferences for how to receive information and provide feedback into permitting decisions.
* Tools that improve information flow between the facility, community and permitting authority
* Decision tools to assist all parties in understanding the nature of disproportionate impacts and mitigating effects of permitting measures
* Guidance or potentially rulemaking to favor or substitute web notifications for one time notifications in newspapers
* EJ Permit Social Network site (a one-stop shop/central point of communication to post all relevent background materials and better communicate with stakeholders – via postings and RSS feeds)
* Permit process descriptions of when/where/how the public can get involved
* Guidance on translation issues
* Guidance on document access (to ensure that the community has free access to documents)
* Guidance for facilities on creating a real dialogue with communities early on in the process (potentially including identifying ways to talk outside of a permit action, avoiding an adversarial relationship, etc)

**Permit Process**

* Permit Checklists
* Permit Process Flowcharts
* Interim guidance on when, where and how to conduct an EJ Analysis/Assessment
* Guidance on how EJ Analyses/Assessments can be integrated into other existing assessment requirements for permitting
* Guidance/protocols on coordination of permitting actions, public comments periods, public notices, meetings and hearings per facility and/or community between numerous permitting actions and/or across media
* Guidance on examining every phase of the permitting process to see if there are impacts that are of concern to EJ communities
* Guidance on how/when to conduct alternative siting analysis (CAA 165(a)(2), 173(a)(5))

**Permit Conditions – how to integrate Environmental Justice into actual permit conditions**

* Best practices/guidance/trainings on developing permits to include issues important to local communities such as increased or enhanced local environmental monitoring, timely public releases of facility-specific data, and transparent and corroborated analysis of the data relative to the host community’s environmental justice priorities and concerns
* Best practices/guidance/trainings on developing permit conditions to better address and protect indigenous peoples’ cultural and subsistence resources
* Examples of how EJ analysis/work has actually translated into changes in the actual permit
* Guidance on how to conduct traditional knowledge information gathering and how to integrate that into permit conditions
* Best practices/guidance/trainings on using a variety of tools in new ways to better address EJ concerns (potentially including BACT, offsets, monitoring/recordkeeping/reporting, SSM, lower potential to emit, AP-42 emissions factors, Title V operating permit approvals)

**Interagency/Government to Government guidance and protocols**

* Guidance/established protocol/trainings for utilizing the role of the Interagency Working Group for Environmental Justice to work across federal agencies on permits on tribal lands
* Guidance on how to integrate government to government consultation and environmental justice executive orders and expectations

**Education**

* Community-based trainings/resources/websites to assist community members on the permitting process (including permit review), EJ tools, and/or risk assessment
* A network of experts accessible to the public, hotline of experts and/or on-line Q&A/portal on issues of importance to EJ and permitting
* Technical assistance resource
* A collective learning forum for EPA staff and managers responding to specific permit challenges

**Cross-Cutting**

* EJ and Permitting E-Library (an online/searchable database organized by key features to serve as a resource for permit writers looking for tools/ideas that have been used successfully and could be replicated)
* Guidance/trainings/other resources on making better use of other EPA roles, such as oversight, in which EPA affects how other permitting authorities implement federal permitting requirements

**“Outside” of Traditional Permitting**

* Guidance/trainings on using resources/programs outside of permitting including:
  + Helping communities develop and adopt community-specific, comprehensive environmental justice plans
  + Community Action for a Renewed Environment (CARE)
  + Consideration of Supplemental Environmental Projects (SEPs) in a permitting context to address environmental justice concerns (possibly in addition to being a mitigation tool for violations)
  + Good Neighbor/Environmental Benefit Agreements
  + Performance Partnership Agreements
  + Memoranda of Agreement/Understanding involving EPA, communities, facilities and state, local or tribal governments