

**RECOMMENDATIONS TO THE PRESIDENTIAL TRANSITION
TEAM FOR THE U.S. ENVIRONMENTAL PROTECTION
AGENCY ON ENVIRONMENTAL JUSTICE ISSUES
SUBMITTED BY THE ENVIRONMENTAL
JUSTICE TRANSITION GROUP**

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RECOMMENDATIONS TO THE PRESIDENTIAL TRANSITION TEAM

FOR THE

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Introduction

These comments are submitted by the Environmental Justice Transition Group, including the following organizations (in alphabetical order): Earth Island Institute; Gulf Coast Tenants Organization; Indigenous Environmental Network; Lawyers' Committee for Civil Rights Under Law; Native Action; Southern Organizing Committee for Economic and Social Justice; Southwest Network for Environmental and Economic Justice; Southwest Organizing Project; and the United Church of Christ.

Contributors to concepts in this paper represent environmental justice groups, civil rights organizations and scholars active in the First People of Color Environmental Leadership Summit and other grassroots conferences and activities around the nation.

The environmental justice movement is the confluence of three of America's greatest challenges: the struggle against racism and poverty; the effort to preserve and improve the environment; and the compelling need to shift social institutions from class division and environmental depletion to social unity and global sustainability.

This movement has established and documented environmental racism and challenges the existing environmental protection paradigm that results in disparate impact. Race is the most significant predictor of the location of pollution sources ranging from environmental contamination caused by landfills and incinerators, to radiation, pesticide poisoning and deleterious air quality. Furthermore, occupational exposures and indoor air pollution exacerbate ambient environmental risks.

Environmental justice is not anchored in a debate about whether or not decision-makers should tinker at the edges of risk-based management. The tenets of environmental justice demand implementation of strategies to eliminate unjust and inequitable effects caused by existing environmental policies.

The mission of the U. S. Environmental Protection Agency must be redefined to address environmental laws, regulations and Agency practices that result in discriminatory outcomes. An environmental

justice model must be imposed incorporating a framework of equal justice and equal protection principles to ensure every citizen's right to be free from pollution.

The need for a comprehensive approach to environmental issues is paramount. Protection of the environment must encompass economic development opportunities that incorporate creation of clean industries and safe jobs.

The Environmental Justice Transition Group supports the efforts of people of color in this nation to speak for themselves. This Transition Paper on Environmental Justice Issues is not intended to supersede the activism of community-based groups and Native American governments. Instead, this Paper is a conceptual document highlighting cross-cutting concerns.

The Transition Paper outlines recommendations to the Presidential Transition Team for the U. S. Environmental Protection Agency (EPA) centering on three key areas: (A) the Agency's institutional focus; (B) targeting regulatory programs, compliance and enforcement activities; and (C) new policy.

RECOMMENDATION: A SHIFT TO PROTECTING ADVERSELY AFFECTED COMMUNITIES MUST OCCUR IN EPA'S INSTITUTIONAL FOCUS.

With regard to fulfilling its mission to protect human health and the environment, EPA must incorporate into its decision-making process factors necessary to safeguard communities facing disproportional pollution exposures. In this regard, there are three initiatives that can immediately be undertaken to address under-protected populations.

- (1) the new Administration should issue an Executive Order and EPA's Office of General Counsel should issue a Formal Opinion establishing the applicability of civil rights laws and regulations to environmental programs;

- (2) EPA should reassess governmental relationships with indigenous peoples, adequately fund and streamline programs and facilitate self-determination; and

- (3) EPA should be elevated to Cabinet status.

- (1) EPA's Office of General Counsel, In Conjunction With the Department of Justice and the Department's Civil Rights Division, Should Issue a Formal Opinion Establishing the Applicability of Civil Rights Laws and Regulations to Environmental Programs, and the New Administration Should Issue an Executive Order Implementing This Policy.

Soon after its creation, EPA issued an Office of General Counsel (OGC) opinion which states that, due to the technical nature of environmental statutes (e.g., setting discharge limits, regulating

chemicals), civil rights laws are inapplicable to the Agency's programs.

In testimony presented in 1971 to the United States Commission on Civil Rights, Administrator William Ruckelshaus contended that the Agency's role in setting environmental standards precluded the application of this nation's civil rights policies to environmental programs.

This testimony and the OGC opinion are inconsistent with the Agency's mandate to protect human health and the environment. EPA's overarching mission is to ensure equal protection from pollution. Instead, to the detriment of communities of color and low-income communities, program implementation and enforcement results in discriminatory results. Based on the evidence, ostensibly neutral technical standards developed by the Agency are implemented in a disparate manner.

It must be made clear at the outset by the new Administration that EPA is not exempt from the tenets of equal protection. EPA should immediately rescind the OGC opinion and issue a new opinion establishing that civil rights laws apply to environmental programs.

To reinforce that the principles of equal protection pertain to the entire scope environmental issues, the President should issue an Executive Order providing for the equitable implementation of environmental programs. The Executive Order should:

- establish a Federal Coordinating Council on environmental justice, including agencies and departments such as EPA, Interior, Agriculture, Labor, Health & Human Services, Housing & Urban Development, Energy, Defense, Transportation, the Centers for Disease Control, the Agency for Toxic Substances & Disease Registry, and the National Institutes for Environmental Health Sciences;

The principal purpose of the Council is to review federal research and research systems, report on gaps and other deficiencies in environmental data, research priorities and compatibility of federal research systems;

The Federal Coordinating Council should institute a framework for technology assessment and examine related issues in the context of social, cultural and political impact;

- direct the White House Council on Environmental Quality to include in its annual report information pertaining to communities in this nation that are experiencing disproportionate pollution risks;

-- mandate inclusion of an equity impact statement that incorporates a presumption equally protecting all people from pollution. The statement would be required for all major federal regulations, grants and projects;

-- create a Federal Advisory Committee Act board to advise EPA and the Federal Council, the membership of which would include indigenous peoples and representatives of community-based groups experiencing disproportionate impact; and

-- direct federal agencies to develop and institute environmentally beneficial procurement practices emphasizing pollution prevention and environmentally friendly products.

(2) EPA Should Reassess Governmental Relationships With Indigenous Peoples, Adequately Fund and Streamline Programs and Facilitate Self-Determination

EPA must reevaluate its programmatic relationships with indigenous peoples. With regard to Native Americans, EPA should confirm the 1984 EPA Indian Policy and ensure its immediate implementation. Further, EPA should develop formal policies that determine federal governmental relationships with indigenous Hawaiians and Pacific-Islanders.

Currently, EPA employs several conflicting approaches vis a vis indigenous peoples and their lands. To remedy these conflicts, Pacific-Islanders, indigenous Hawaiians and Native American Tribes must be included at all levels in development of federal environmental policy, including regulations, compliance and enforcement activities.

The concerns of and problems experienced by Native Americans, Pacific-Islanders, and indigenous Hawaiians are distinct and solutions must be specially tailored. However, federal approaches on indigenous lands must promote self-determination in implementation of regulatory, compliance and enforcement programs.

To enhance efficiency and effective use of targeted resources, EPA should streamline and consolidate national Indian Program activities into a central office. Currently, Indian Program responsibilities are fragmented into three distinct offices: the Office of Federal Activities; the Office of Regional Operations and State and Local Relations; and the Office of the Deputy Administrator. In addition, in conjunction with Native Americans, EPA should consider creating a Tribal Operations Committee to commence the process of institutionalizing Tribal needs into the Agency's budget, planning and implementation processes.

To facilitate sovereign governance and the ability of Native Americans to protect themselves and their sacred sites from pollution exposures, EPA must ensure availability of adequate funding and

training opportunities, as well as Tribal access to EPA program managers and upper level administrators.

The new Administration should support adjustments in basic Congressional funding formulas so that environmental programs instituted by Tribal governments can be equitably funded at levels sufficient to manage and enforce those programs. Furthermore, resources should be directed to both large and small Tribal communities.

In targeting resources and increasing funding for Indian Programs, particular attention must be given to enhancing the development of Tribal infrastructure. Tribal lands encompass fifty-six million acres and over 500 tribal jurisdictions. However, out of 18,000 full-time EPA employees, only 100 are dedicated to the Indian Program.

EPA must reevaluate federal approaches to regulating the environment of indigenous Hawaiians and Pacific-Islanders. These indigenous people must be integrated into federal decision-making processes concerning their unique lands and those lands sacred to them must be afforded special protection, including protection from pollution.

EPA should institute reporting mechanisms related to the environment of indigenous people. EPA should regularly update the 1990 Indian Resources Task Force Report and, annually, EPA should issue separate reports to Congress on the status of the environment on Tribal lands, in the Hawaiian Islands, and in the Pacific Islands.

(3) EPA Should Put Priority Attention On Developing Countries

Consistent with the Agency's policy of setting risk-based priorities, EPA should prioritize African, South American and Asian programs in the Office of International Activities. In constructing international treaties and United States foreign policy the new Administration must recognize and promote self-determination.

The Administration must reevaluate policy conflicts illustrated in the approaches pursued by the United States in eastern Europe and developing countries concerning environment and energy. Currently, the United States is attempting to encourage and reinvigorate the (albeit more environmentally friendly) use of energy and natural resources by eastern European countries in order to rebuild the economy and improve living standards.

However, in developing countries, the United States is using economic and financial aid leverage to discourage (albeit more environmentally unfriendly) use of energy and natural resources; energy and resources upon which many developing nations depend to elevate their standard of living. This is inequitable foreign policy and these approaches must be revised.

In view of the relationship between environmental and economic policy in developing countries, the new Administration should converge

international strategies to preserve the environment and foster economic development in developing nations with an omnibus policy to eliminate drug exports into the United States.

Increasingly in developing countries, ecosystems are being destroyed and replanted with crops that are processed into illegal drugs. United States foreign policy must promote quality economic development as an alternative to drug exports that destroy the lives and minds of our citizenry.

4. EPA Should Be Elevated to Cabinet Status and the New Administration Should Support Other Key Legislative Initiatives

During the 102d Congress, Representative John Conyers (D-MI) and Senator John Glenn (D-OH) spearheaded a bipartisan campaign to elevate the Agency to Cabinet status. Subject to issuance of an Executive Order, an OGC opinion and an opinion by the Department of Justice establishing the applicability of civil rights laws to environmental programs, the President should work with Congress to accomplish this goal.

A Department-level EPA reorganized to promote overall accountability and efficiency in regulatory, compliance and enforcement programs would facilitate equitable implementation of statutory programs. Environmental justice must be explicit in the legislation's mission statement as one of the principal areas of focus for the new Department and a major area of responsibility for the Secretary who should annually report to Congress on the Department's progress.

In addition to Cabinet status legislation, the new Administration should support legislative initiatives to remedy disproportionate pollution risks. 1993 will be an unprecedented year for Congressional consideration of environmental statutes, including the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act (Superfund), the Resource Conservation and Recovery Act, the Federal Insecticide, Fungicide and Rodenticide Act, and the Safe Drinking Water Act.

Furthermore, the new Administration should work with Congress to develop and enact laws creating jobs training and economic development opportunities, which would be established and implemented as programs by community-based organizations. Environmental jobs, such as inspectors and cleanup technicians, would provide an employment base for workers of color in such areas as revitalized industrial sectors and federal facilities.

In the legislative context, the new Administration has a unique opportunity to redress joblessness, lack of access to health care, and other such tragic and unjust circumstances as elevated health risks and high mortality rates caused by disproportional environmental exposures in this nation.

RECOMMENDATION: EPA SHOULD SUBSTANTIALLY REORIENT REGULATORY, COMPLIANCE AND ENFORCEMENT PROGRAM PRIORITIES.

To redress environmental problems in under-protected communities, EPA should substantially reorient regulatory, compliance and enforcement program priorities. EPA has an obligation to remedy disparate environmental effects by immediately targeting and establishing as a high priority development and implementation of solutions to alleviate discriminatory pollution exposures in communities of color and sensitive populations.

In this regard, EPA should undertake four initiatives to redress disproportionate pollution risks. EPA should:

- (1) prioritize eleven program areas affecting people of color and sensitive populations;
- (2) target research & development efforts, including restructuring the focus to reporting and data collection on affected populations;
- (3) target compliance inspections and enforcement to protect communities of color exposed to disproportionate environmental risks; and
- (4) revise worker protection regulations to ensure workplace and employee safety

(1) EPA Should Prioritize Environmental Programs to Redress Disparate Pollution Impact

Due to federal and state resource limitations, EPA, the states and Congress have initiated a dialogue on planning sequential or prioritized implementation of environmental programs (e.g., safe drinking water, clean water, clean air). To the greatest possible extent, sequencing and prioritizing must be based on protecting those most severely exposed considering factors such as synergistic effects, multiple sources and sensitive population.

The Agency's work on prioritizing environmental program areas to protect human health should first commence in eleven specific areas: (i) indigenous peoples; (ii) farmworkers; (iii) radiation exposure; (iv) waste facility siting and cleanup; (v) clean air; (vi) clean water; (vii) drinking water; (viii) urban areas; (ix) free trade and border issues; (x) EPA strategic planning and budget; and (xi) state program implementation.

(i) indigenous peoples

Access and input into the federal process by indigenous people is paramount. Major issues include the ensuring basic rights and access to natural resources; groundwater and drinking water protection; expediting cleanup of federal facilities affecting indigenous lands;

restoring Office of Management & Budget cuts to the Bureau of Indian Affairs and infrastructure resources; ameliorating the impact of uranium mining and energy production activities on indigenous lands; and cessation of nuclear testing and radioactive waste disposal affecting Tribes and Pacific-Islanders.

(ii) farmworkers

On August 13, 1992, after delaying nearly 9 years, EPA issued the Farmworker Protection Standard (40 C.F.R. Parts 156 and 170) revising a prior set of regulations that were widely known to be woefully inadequate. Though deficient, the current set of regulations need substantial work in interpretation, implementation and enforcement to improve protections for farmworkers and their families ((95 percent African-American, Asian-American, Native American and Latino) from exposure to agricultural pesticides.

In conjunction with efforts on the Farmworker Standard, EPA should vigorously implement and enforce the risk reporting requirements set forth in Section 6(a)(2) of the Federal Insecticide Fungicide, and Rodenticide Act. EPA should increase the database on farmworker exposure to pesticides and target programs in research & development. The new Administrator should acknowledge the priority designation accorded farmworker protection by the Science Advisory Board.

(iii) radiation exposures

Historically, EPA is weak on regulating radiation exposures experienced by Native Americans, Chicanos, and Pacific-Islanders. For example, a notorious uranium mining operation breach in the mill tailings dam released thousands of gallons of radioactive water and mill tailings cascaded down the Rio Puerco river contaminating a nearby Navaho reservation and its inhabitants. EPA has not taken enforcement action in this case or in other cases due to confusion over federal agency jurisdiction among EPA, the Department of Energy and the Nuclear Regulatory Commission.

The new Administration should establish EPA as the primary enforcement authority over radioactive pollution, as well as clarify EPA's oversight responsibility under the Federal Facilities Compliance Act. EPA authority should encompass integrating environmental justice concerns into remediations conducted at federal facilities, including assessing resource needs.

The new Administration should reexamine federal preemption under the Atomic Energy Act and evaluate whether preemption should be eliminated and state and local governments authorized to control radiation exposures.

(iv) waste facility siting and cleanup

Several studies and reports demonstrate that people of color face significantly higher risks due to disproportional siting of waste facilities. The litany of data is extensive. Three out of five

African-Americans live in communities with abandoned toxic waste sites. Sixty-percent or fifteen million African-Americans live in communities with one or more abandoned sites.

Three of the five largest commercial hazardous waste facilities are located in predominantly African-American or Latino communities accounting for forty percent of this nation's total estimated landfill capacity. Communities with hazardous waste incinerators generally have large populations of color -- eighty-seven percent higher than the national average.

Communities where incinerators are proposed have populations of color sixty percent higher than the national average. Property values in communities that host incinerators are thirty-eight percent lower than the national average and, where incinerators are proposed, property values are thirty-five percent lower than the national average. Based on this data alone, the conclusions are clear. The impact is discriminatory.

EPA is obligated to correct these inequities. On an expedited basis, the Agency should institute a moratorium on siting in communities already experiencing disproportionate impact; reevaluate implementation of the Resource Conservation and Recovery Act based on the tenets of equal protection; and ensure that future siting of treatment, storage and disposal facilities (see 40 C.F.R. Part 358) does not exacerbate extant risks in communities of color.

EPA should establish regional procedures and guidelines which ensure contact with and input from affected communities at the outset of federal facility site evaluation and government investigations regarding remediation of toxic and hazardous waste sites. Furthermore, it is essential for EPA to expedite Superfund cleanups in communities of color and reassess discriminatory Agency buyout policies.

(v) clean air

Research on the impact of poor air quality on people of color is incontrovertible. Air quality is the most extensively studied issue associated with disproportionate exposure. If aggressively implemented, the Clean Air Act is potentially one of the most environmentally beneficial pieces of legislation for communities of color in this nation.

If effectively implemented, the Act would address the disproportionate impact of degraded air quality. The Section 173(a) program is critical because it mandates EPA review of "social costs." Many of the provisions contained in the clean air law provide communities with access to information regarding siting factors and the permit process for facilities that emit air toxics.

In implementing the public participation requirements of this Act, the Agency must ensure that all available information is translated in a form that is easily understandable to citizens. Immediately, the new Administration must rescind the giant loophole in the Clean Air Act

created by the Bush Administration allowing 35,000 refineries, chemical and pharmaceutical plants utilities and other environmentally burdensome companies that already pump billions of pollutants into the air to pump more emissions without subjecting the increases to public review.

EPA should identify and ameliorate (or report to congress on) the regressive impacts of both environmental and economic policies such as the gas tax, green taxes and Clean Air Act permit trading. EPA must reassess the new clean air permit trading system and ensure that it precludes shifting the burden of air pollution onto communities of color. Trading that results in disproportionate impact (including reduction in property values) should be prohibited.

(vi) clean water

EPA should assess whether sewage treatment facilities and combined sewer overflows are more often located in communities of color. The Agency should determine what infrastructure improvements are needed to enhance these facilities to state-of-the-art through construction grants so that residents are not plagued by noxious fumes and other deleterious exposures.

EPA should set water quality standards that schedule phase-down and, where appropriate, ban the discharge of contaminants of concern to people of color who fish and consume those fish. In the interim, EPA should intervene in the state fish consumption advisory process to guarantee that advisories are issued to citizens on a regular basis and that they are uniform and understandable.

(vii) safe drinking water

Many communities of color have insufficient resources to construct and/or maintain public drinking water systems and to implement EPA regulations controlling drinking water contaminants. EPA should evaluate ways to set regulatory priorities for these communities, provide technical assistance and infrastructure improvements, including appropriate resources.

(viii) urban areas

EPA should focus on urban areas to develop pollution prevention initiatives, recycling and hazard abatement programs. Asbestos and lead abatement and removal, and cleanup of industrial and formerly industrial areas with high amounts of waste should further the goals of creating jobs and community-based economic development.

(ix) free trade and border issues

Industrial dumping on the 2000 mile Mexico-United States border is causing birth defects, illnesses and death. EPA should immediately enforce provisions in the Toxic Substances Control Act and other statutory administrative subpoena and data gathering authorities to

collect information from multinational corporations operating on the Mexico-United States border.

The new Administration should delay implementation of the North American Free Trade Agreement until a federal study is completed on information associated with chemicals and exposures, and study conclusions can be factored into treaty considerations.

EPA should expand the Rio Grande initiative to include both the upper and lower Rio Grande River, including geographic considerations, watershed implications and exposed communities.

(x) strategic planning and budget

EPA must integrate environmental justice policy into Operating Year Guidance, the Agency's strategic plans, regional workplans, annual Agency Themes and State-EPA Agreements.

(xi) state program implementation

EPA should develop and publish in the Federal Register, requirements which mandate that states equitably implement delegated environmental programs, including grant conditions, permits, compliance and enforcement activities.

(2) EPA Should Target Research & Development Efforts, Including Restructuring the Focus to Reporting and Data Collection On Affected Populations.

EPA should reconcile federal reporting and data reference systems among agencies and departments to emphasize collecting and analyzing data on populations most exposed to environmental contamination, including synergistic effects, multiple sources and sensitive populations. EPA should target research & development, data collection and analysis to support development of the rules to protect over-exposed populations

(3) EPA Should Target Compliance Inspections And Enforcement to Protect Communities of Color Exposed to Disproportionate Environmental Risks.

EPA should target enforcement initiatives in communities of color inundated with pollution risks. This initiative should be implemented in areas such as Cancer Alley, Richmond, California, South Chicago and high-tech industries in the Southwest. In addition, targeting high risk populations or areas can be combined with other environmental programs; for example, a farmworker protection initiative could be combined with a pesticides and groundwater pollution initiative and a pesticide farm runoff initiative.

EPA monitoring systems must be revised to encompass communities of color. Even well-recognized toxics, such as lead, are not well-monitored. Nor is data well-correlated with actual exposures.

EPA must amend the Supplemental Environmental Projects policy and to enable Agency attorneys to credit penalties against environmentally-beneficial projects in high exposure areas.

RECOMMENDATION: NEW POLICY INITIATIVES MUST BE IMPLEMENTED TO REDRESS DISPROPORTIONATE IMPACT

EPA must develop new policy initiatives in several critical areas in order to redress disproportionate impact of environmental contamination on communities of color. These new initiatives are as follows:

-- Consistent with the Presidential Campaign theme that coupled environmental protection with economic growth, EPA and related departments need to support investment in sustainable development and infrastructure;

-- The new Administration should initiate an environmental/industrial policy of investment in sustainable development, i.e., sustainable industries and technologies. The policy, with balanced citizen and industry input, should shift investment and tax incentives toward conservation, pollution prevention and a long-term commitment to protecting communities;

-- Available public funds should be directed toward economic development opportunities in affected areas (for example, the new Chrysler Jeep plant in Detroit). These programs must encourage geographic stability, so that investments revitalize existing infrastructure instead of creating yet more disposable communities, either foreign or domestic;

-- As a means to rebuild infrastructure in communities and around federal facilities, in conjunction with other agencies, states, and educational institutions, EPA should support creation of environmental jobs, training and education in environmental remediation;

-- The Administration and EPA must revise cost-benefit analysis guidelines to include intangible costs related to quality of life, health, safety and environmental justice;

-- During the Reagan-Bush era, the Administration developed twin cross-cutting regulatory relief policies, cost-benefit analysis and a presumption for federalism in health and environmental standards, which can adversely affect highly polluted communities by resulting in racial

inequities. EPA should be the lead agency in reviewing these cost-benefit policies;

-- EPA should work with civil rights groups to ensure that pollution prevention initiatives are equitably implemented. As presently conceived by the Agency, pollution prevention initiatives will achieve mixed results (e.g., exposure to more concentrated toxic and hazardous chemicals) for workers of color and nearby residents;

-- EPA and the Occupational Health and Safety Administration (OSHA) have issued a limited number of environmental health and safety regulations associated with high-tech industry. EPA should work with OSHA to review and strengthen the EPA-OSHA Memorandum of Understanding to address the problems of workers of color and their families who experience high exposure;

-- EPA is scheduled to propose in the Federal Register, an ill-considered Environmental Excellence Program, based on the OSHA VPP Program. An innovative environmental excellence program would be more appropriate, including economic incentives such as long-term capital commitment to an area; environmental protection and long-term planning; jobs, job training and economic development; multi-media and/or one-stop permitting and long-term permitting. The critical point is to avoid rewarding inequitable past actions;

-- EPA must support and fund community-based delivery of environmental services (e.g., communiversities that link academic institutions with communities in need of research, health assessments, data analysis) by combining the resources of federal, state, and local environmental protection agencies, local colleges and universities;

These entities should combine to focus a significant portion of their service delivery efforts on environmental and health concerns at the community level;

-- To establish credibility in EPA programs, the Agency must reverse its historical resistance to cultural diversity and integration in the workforce. EPA should put employees of color in substantive decision-making positions and heed input;

-- EPA regulations and programs should generally shift the burden of proof to polluters seeking permits in areas which affect highly exposed or multiple-exposure communities;

-- In conjunction with other agencies, EPA should set conditions for the World Bank, the Agency for International Development, and the International Monetary Fund on exports of pesticides and wastes. Furthermore, EPA should be granted oversight responsibility to ensure compliance with these conditions. As mentioned above, such actions should be coordinated with an international policy to eliminate drug exports into the United States;

-- EPA should expand the community right-to-know initiative to include opportunities for communities to be involved in inspections and negotiation or public review of governmental environmental actions involving siting of industrial facilities; and

Enhancing community access to information and improved data collection and input is key. Without these tools, informed consent is nonexistent and decision-making concerning environmental management in this nation will continue to be hamstrung by community distrust and opposition.

Conclusion

Environmental justice is cross-cutting affecting every media area (i.e., air, land, water), as well as regulatory programs, compliance programs and enforcement. What is ultimately at stake in the environmental justice debate is everyone's quality of life. The goal is equal justice and equal protection from pollution. To combat environmental racism, the new Administration and EPA should immediately adopt the recommendations outlined above.