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**Procedures for the Identification and Involvement
of Environmental Justice Populations and
Native American Tribal Governments by the
Non-Stockpile Chemical Materiel Product**

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**Procedures for the Identification and Involvement of
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by the U.S. Army Non-Stockpile Chemical Materiel Product**

This working document, *Procedures for the Identification and Involvement of Environmental Justice Populations and Native American Tribal Governments by the U.S. Army Non-Stockpile Chemical Materiel Product*, has been developed for the Product Manager for Non-Stockpile, LTC Christopher Ross to direct the interactions and involvement of environmental justice populations that may be impacted by non-stockpile materiel activities. It also serves to identify and provide for the consultation and cooperation of native American Tribal governments that have treaty, cultural or religious rights on non-stockpile sites. The procedures and associated activities were developed under the direction of Louise Dyson, Public Affairs for Non-Stockpile Product through support from Coleman Research Corporation.

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The U.S. Army Program Manager for Chemical Demilitarization (PMCD) established the Non-Stockpile Chemical Materiel Product (NSCMP) with the mission to provide centralized management and direction to the Department of Defense for the disposal of non-stockpile chemical warfare materiel in a safe, environmentally sound, and cost-effective manner.

The Non-Stockpile Chemical Materiel Product has identified more than 200 known or potential sites that may contain chemical warfare materiel. These sites are found in more than 90 locations in 38 states and territories across the United States, including the District of Columbia, the Virgin Islands and Guam.

The Product Manager for Non-Stockpile Chemical Materiel and a team of scientists, engineers, and support staff continue to research and develop treatment options; prepare destruction plans; and comply with all applicable federal, state, and local laws in the disposal process. In addition to the research and development activities, the Non-Stockpile Product produces three site-specific plans prior to any activities at the site: (1) an *Interim Holding Facility Plan*, which outlines how the materiel will be monitored and stored prior to disposal or treatment, (2) a *Transportation Plan*, which provides the mode and route for any on-site or off-site transportation of non-stockpile materiel, and (3) *Chemical Waste Materiel Destruction Plan*. The Non-Stockpile Product seeks to ensure maximum protection to the public, the personnel involved in the destruction, the communities, and the environment.

The Non-Stockpile Product is also committed to providing public outreach to all communities that are potentially impacted by treatment, disposal or transportation of non-stockpile materiel through an opportunity for public involvement and participation. A key segment of the population that will require a special emphasis to ensure equitable treatment and input –includes low-income and minority communities, what we term here “Environmental Justice populations.” In addition, the U.S. Army recognizes its federal trust responsibility in protecting the rights and resources of Native American tribal governments and the communities they represent. In an effort to ensure the participation of all members of communities that may be potentially impacted by activities conducted by the U.S. Army Non-Stockpile Materiel Product, the procedures in this document have been developed to identify impacted populations and develop site-specific implementation to facilitate their involvement in program decisions.

Based on the Executive Order 12898,¹ guidance issued from the Department of Defense, guides from the National Environmental Justice Action Committee (NEJAC)², and PMCD's *Environmental Justice Strategy Implementation Plan*, the Non-Stockpile Product has developed the outlined procedures to identify potential or perceived impacts to environmental justice (EJ) populations and Native American Tribal governments in order to determine appropriate interactions to gain their participation at those sites prior to major decisions in technology, treatment, disposal or transportation.

¹ *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Population*, Executive Order 12898, February 11, 1994.

² *Guide on Consultation and Collaboration with Indian Tribal Governments and the Public Participation of Indigenous Groups and Tribal Citizens*, National Environmental Justice Action Committee, Indigenous Peoples Subcommittee, November 2000.

Non-Stockpile Product Approach to Environmental Justice (EJ)

Federal law (Executive Order 12898) specifies that as a part of their mission Federal agencies invite minority and low-income populations to participate and make an extra effort to provide opportunities for them to become informed, in order to better voice their issues and concerns. To ensure compliance with the letter and the spirit of the law, the Non-Stockpile Product has considered specific public outreach activities following the initial identification of any potential sites to ensure appropriate EJ activity is considered in all schedules. The approach encompasses three stages designed to support the early identification and effective involvement of EJ populations and Tribal governments in reviewing technology, transportation and disposal plans at each site, in addition to the site-specific implementation plans already underway nationwide by the Non-Stockpile Product. These three stages include reviewing each non-stockpile site to:

- Identify any impacted Tribal governments or minority and low-income populations that meet EJ criteria
- Assess potential adverse impacts
- Develop site-specific implementation and/or consultation and coordination to avoid or mitigate impacts

Stage One: Identifying minority, low-income populations that meet EJ criteria.

The first stage, identification, includes developing site profiles based upon a review of all areas surrounding potential non-stockpile sites, as well as an assessment of Tribal rights, treaties and lands that might be impacted. This review uses the criteria set out in EPA's Superfund Demographic Identification Criteria for establishing a baseline for identifying potential environmental justice populations. It looks at income and race/ethnicity percentages in the area under review against national and state averages in order to identify potential environmental justice populations. The review is conducted at the level of the census block, or in rural areas, the enumeration district, a comparable level of geographic resolution.

The impact area, or footprint, of a proposed action may not be easily determined in terms of impacts on surface water, groundwater, air quality, fish/wildlife, cultures, traditions, religious sites or transportation. For that reason, in identifying potential EJ populations, the Non-Stockpile Product will use census block data within a 10-mile radius of the anticipated non-stockpile materiel activity. When reviewing census block data for any of the existing Stockpile sites that have non-stockpile materiel activity, the Protective Action Zone (PAZ) will be included. This will allow a buffer large enough to ensure the area has been reviewed to identify populations that would qualify under environmental justice. The information will be reviewed and prioritized by percentage of low-income and race/ethnicity in order to determine what areas should be targeted for

site fact-finding information and research. These activities are summarized in PMCD's *Environmental Justice Strategy Implementation Plan*.

For any identified Tribal governments, the Tribes will be designated by those with jurisdictions immediately adjacent (within 5 km) to those located 5-50 km, 51-100 km, or along key transportation routes serving a non-stockpile materiel location. This provides for review of impacts to surface water, groundwater, air quality, fish/wildlife, cultures, traditions, religious sites or from transportation, which will be more inclusive of Tribal treaty, religious and cultural resource rights and jurisdiction.

Minority and low-income populations. Minority and low-income populations will be identified as separate groups for review, with percentages compared for each. While the census block information will identify statistical areas that exceed the numbers identified as potential EJ populations, it also should be acknowledged that it does not necessarily indicate that an EJ issue or concern exists. This must be established by further research at the site with the identified populations in order to determine the mechanisms that are present for communication, involvement, decision-making and gaining insight into the local area.

The census block/enumeration district information assists the Non-Stockpile Product in making a "first-cut" at identification and prioritization of EJ populations, as they are defined by EPA Region 5 criteria. EPA's criteria define "low-income" as at or below twice the U.S. Census-defined poverty level.

Poverty Guidelines: How to measure poverty. Following the Office of Management and Budget's (OMB's) *Statistical Policy Directive 14*, the government has established a set of money income thresholds that vary by family size and composition to detect who is poor. If a family's total income is less than the threshold that has been set, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically within the 48 contiguous states, but there are separate measures for Alaska and Hawaii. The thresholds also are updated annually for inflation using the Consumer Price Index (CPI-U). The official poverty definition counts money income before taxes and does not include capital gains and noncash benefits (such as public housing, medicaid, and food stamps). Poverty is not defined for people in military barracks, institutional group quarters, or for unrelated individuals under age 15 (such as foster children). They are excluded from the poverty universe--that is, they are considered neither as "poor" nor as "nonpoor."

The table below outlines the established thresholds for poverty:

2000 HHS Poverty Guidelines³

Size of Family Unit	48 Contiguous States and D.C.	Alaska	Hawaii
1	\$ 8,350	\$10,430	\$ 9,590
2	11,250	14,060	12,930
3	14,150	17,690	16,270
4	17,050	21,320	19,610
5	19,950	24,950	22,950
6	22,850	28,580	26,290
7	25,750	32,210	29,630
8	28,650	35,840	32,970
For each additional person, add	2,900	3,630	3,340

Definition of minority status. The EPA criteria determine “minority status” in two ways: (1) if the area’s percentage of minority population is at least twice the statewide percentage; or (2) if the minority population is greater than 30 percent of the area’s general population. The sites will be categorized using the table below to identify the populations and designate priorities. For non-stockpile sites, the “area” has been defined as the 10-mile radius surrounding the potential site, as the exact location of non-stockpile material can not be determined until site work commences. This will ensure that there would be negligible, if any, impacts outside this area with the rare exception of transported material.

EPA minority population criteria for initial Non-Stockpile sites

State	Definition One (2 Times State Percentage)		Definition Two (Minority Population > 30% Site)
	State Minority Percentage	Site Criteria To Qualify	% of Site Population Comprised of Minorities
Alabama	26.4%	52.7%	
Anniston			19.1%
Camp Sibert			15.4%
Fort McClellan			21.0%

³ SOURCE: *Federal Register*, Vol. 65, No. 31, February 15, 2000, pp. 7555-7557.

Alaska Fort Richardson Gerstle River	24.5%	49.0%	19.4% 10.4%
Arkansas Pine Bluff	17.3%	34.5%	30.8%
California Santa Rosa	31.0%	62.0%	10.7%
Florida Brooksville Withlachochee	16.9%	33.8%	4.8% 16.6%
Georgia Fort Benning H. Smart Field	29%	58.0%	40.0% 46.4%
Illinois Savannah Depot	21.7%	43.4%	1.1%
Maryland Lauderick Creek	29.0%	58.0%	10.9%
New Jersey Fort Hancock Rariton	20.7%	41.4%	9.6% 20.8%
New Mexico Holloman AFB	24.6%	49.2%	17.4%
North Carolina Laurinburg- Maxton	24.4%	48.8%	60.6%
South Dakota Black Hills	8.4%	16.8%	3.5%
Tennessee Memphis Depot	17.0%	34.0%	51.7%
Texas Camp Bullis	24.8%	49.6%	13.4%
Utah Ogden Depot	6.2%	12.4%	7.7%
<i>Source: U.S. Bureau of the Census, 1990</i>			

It should be noted, also, that census data are now nearly a decade old, requiring additional site information to retain validity of any assessment. Additional research will help the Non-Stockpile Product ensure that it is not disproportionately affecting minorities or low-income populations whose block or neighborhood did not fall within the criteria established for EJ populations. It may be that population changes since the last census would qualify them currently or that mitigating circumstances in their community may cause a perceived or real impact.

The Non-Stockpile Product will review all relatively small percentages of the total population that are mostly comprised of minority or low-income populations surrounding the Product to identify any disproportionately high and adverse effects. These can result from the group's use of, or dependence on, potentially affected natural resources, or due to the group's daily or cumulative exposure to environmental pollutants as a result of their close proximity to the source. The data may show that a distinct minority population may be below the thresholds defined by guidance on low-income or minority populations. However, as a result of particular cultural practices, that population may experience disproportionately high and adverse effects. For example, the construction of a new treatment plant that will discharge to a river or stream used by subsistence anglers may affect that portion of the total population. Also, potential effects to on- or off-reservation tribal resources (e.g., treaty-protected resources, cultural resources and/or sacred sites) may disproportionately affect the local Native American community and implicate the federal trust responsibility to Tribes.

TABLE 1. Categorization / Prioritization of Site Census Block Populations

Category A*	Category B*
<p>Low Income</p> <p>High Minority</p> <p><i>Highest level of action or priority</i></p>	<p>High Income</p> <p>High Minority</p> <p><i>High level of action or priority</i></p>
Category C*	Category D*
<p>Low Income</p> <p>Low Minority</p> <p><i>High level of action or priority</i></p>	<p>High Income</p> <p>Low Minority</p> <p>No extra action is required</p>

* As defined in Initiative 5 of PMCD's Environmental Justice Strategy Implementation Plan

Tribal Governments. The U.S. Government has a unique legal relationship with native American Tribal governments. It is the policy to work with Tribes on a "government-to-government" basis and direction was recently updated through Executive Order 13175.⁴ It requires that "the Federal government establish regular and

⁴ Consultation and Coordination with Indian Tribal Governments, Executive Order 13175, November 6, 2000.

meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationship with Indian tribes.” In addition, the *Department of Defense American Indian and Alaska Native Policy* issued by Secretary of Defense William S. Cohen in October 1998 outlined the principles for all DoD interactions with Federally recognized Tribal governments.

The legal status of Tribes distinguishes them from community-based interest groups, environmental organizations, and other stakeholder groups. In addition, the sovereign nation status of Tribes recognizes they are not subdivisions of state or local government and the relationship between the Federal government and Tribes should be one of “government-to-government.” As explained in NEJAC’s *Guide on Consultation and Collaboration with Indian Tribal Governments*, “the cornerstone of the government-to-government relation is the federal government’s *trust responsibility* to Indian Tribes. Under the trust doctrine, the federal government has ‘charged itself with moral obligations of tribal interests as they fulfill their overall missions.’

The protection of natural resources, cultural and religious rights and historically ceded land all fall within areas that the Non-Stockpile Product will consider when determining any impacts on Tribal populations by treatment, disposal or transportation activities. As provided by many of the federal environmental protection statutes, (e.g. Clean Air Act and the Clean Water Act), Tribes are to be given treatment equal to States. Involvement and participation by the Tribes in these locations will be necessary for the successful mission of the Non-Stockpile Product.

To identify Tribal governments and populations that may be impacted by the activities of the Non-Stockpile Product, a review of a database containing the recognized Tribal governments and their land rights will be reviewed. As stated earlier, for any identified American Indian Tribal populations, the Tribes will be designated by those with lands immediately adjacent (within 5 km) to those located 5-50 km, 51-100 km, or along key transportation routes serving a non-stockpile materiel location. This provides for review of impacts to surface water, groundwater, air quality, fish/wildlife, cultures, traditions, religious sites or from transportation, which will be more inclusive of Tribal treaty, religious and cultural resource rights and jurisdiction.

Stage Two: Community assessment; identifying adverse impacts.

The second stage of Non-Stockpile procedures involves conducting community research and identifying any anticipated adverse impacts. In this stage, the Non-Stockpile Product will informally interact with local commands and community representatives at the identified sites to determine the governmental or geopolitical unit(s) that can serve to represent concerns and input for decision-making in the community. The area considered will be based upon the footprint of potential impacts from the Non-Stockpile efforts (either remediation or transportation). The Non-Stockpile Product will also conduct informal assessments to identify opinion leaders, civic leaders, governmental leaders, media and other means of disseminating information in the community. This

information will be useful in determining site-specific mechanisms for interacting and allowing for participation by the community.

State government agencies such as the Department of Economic Development, Planning and Development Department, State Minority Business Office, and State Enterprise Zone Offices will also be contacted for information on the communities. For example, if an area is designated as an "enterprise zone", unique economic and demographic data may exist in that particular area, access to which could enhance the Non-Stockpile Product's ability to assess the economic situation of a given area.

Using the census data, the Non-Stockpile Product will identify where the EJ populations reside in order to look for areas where the community gathers, impacted transportation routes, evacuation routes, medical facilities, major employers and city/county buildings. This information will be reviewed in order to gain an initial understanding of how to facilitate interactions in these communities.

The Non-Stockpile Product will also conduct an informal literature review, as well as interviews with key individuals to identify any current perceived, unresolved or resolved EJ issues that might have occurred in the community. This will assist the Non-Stockpile Product to use existing methods of mediation or communication that may already have been established and provide a lessons-learned in the community from which to develop its own interactions and activities.

The types of community-specific impacts that the Non-Stockpile Product will consider are:

- Population demographics including age, density, literacy and economic growth
- Geographic factors such as climate, geomorphic and hydrophic features
- Economic factors such as health care access, infrastructure, life support resources, and makeup of local industry
- Unique cultural or ethnic differences including access, understanding and job security
- Communication barriers or concerns such as literacy, language or appropriate representation

Demographic Factors Demographic factors are one of the key components of environmental justice. Race, ethnicity, and low-income status are some of the primary considerations of the environmental justice movement. However, numerous other	Population Age	Older or younger populations may be more susceptible to risks, when taking into account special health concerns of the elderly and potential for greater exposure in younger populations (e.g., ingestion of soil). In addition, children's immature bodily defense systems may make them more susceptible to toxic effects.
	Population Density	High population density may promote a synergistic effect between industrial pollutants and typical urban pollutants (e.g., ground level ozone), especially if industry is located in close proximity (5 miles or less) to high-density populations. Low population density may also lead to underestimating the actual environmental harm to the affected population when conducting a risk assessment.

demographic factors also may play vital roles in an environmental justice assessment.	Literacy	If documents are technically complex and not adequately explained communities with lower levels of education may encounter difficulty in its ability to understand or sufficiently identify and interpret risk and other factors.
	Economic Growth	Rapid or severe changes in population or economic growth rate may result in potential impacts to existing community or public services and infrastructure. Changes in growth rate may include: (1) an increase in low-income or minority population(s) in an area (e.g., migration), (2) high birth rates, and (3) cumulative impacts due to multiple sources of population increases.

Geographic Factors Certain communities may be at high risk from environmental hazards or exposed to substantial environmental hazards due to geographic factors that isolate them from other surrounding communities or that tend to allow pollutants to accumulate in the environment surrounding the community.	Climate	Weather patterns (e.g., prevailing winds) that may concentrate pollutants in a certain area, allow pollutants to migrate, increase certain exposure pathways (such as respiration), or cause pollutants to behave in a manner that differs from that expected under normal weather conditions.
	Geomorphic Features	Mountains, hills, or other surface features, natural or human in origin, that may affect pollutant dispersal and may focus or funnel pollutants in particular directions or to particular locations.
	Hydrophic Features	Presence of surface water and/or aquifers that may provide drinking water, subsistence fisheries, cultural significance and use, and recreational use.

Economic Factors Economic factors can be divided into two categories: the economic condition of the individuals in the community in question, and the overall economic base of the community. The economic condition of the individuals in the population, if poor, may exacerbate risk factors and may preclude avoidance of risk factors. The economic condition of the community at large may result in situations that preclude the local government's ability to adequately protect the population or may promote the acceptance of disproportionately high and adverse effects.	Income Level	This includes such issues as whether affordable quality health care is available and, whether any cultural barriers exist to accessing health care. Many low-income and/or minority communities lack adequate levels and quality of health care, often due to lack of resources or lack of access to health care facilities.
	Infrastructure Conditions	Consideration should be given to whether existing infrastructure provides sufficient protection from adverse impacts (e.g., protection of domestic water supply, especially if the community relies on public or non-public drinking wells or surface water; adequacy of sewage facilities) and the effect that new facilities may have on the ability of existing infrastructure to be reliable and provide adequate protection. In many low-income and/or minority communities, historic allocation of resources has resulted in inadequate infrastructure development and maintenance.
	Life-Support Resources	This includes subsistence living situations (e.g., subsistence fishing, hunting, gathering, farming), diet, and other differential patterns of consumption of natural resources. If a community is reliant on consumption of natural resources, such as subsistence fishing, an additional exposure pathway may be associated with the community that is not relevant to the population at large. Similarly, dietary practices within a community or ethnic group, such as a diet low in certain vitamins and minerals, may increase risk factors for that group

	Distribution of Costs	Consideration of the distribution of costs to pay for environmental projects to the extent that regulations and programs are paid for by user fees on necessary goods and services (e.g., sewer and water bills, garbage services, electric bills, gasoline taxes). These have a substantial negative effect on low-income families who must pay a disproportionate fraction of their income for these goods and services, the addition of user fees for another plant or facility may add to the disparate treatment of those individuals.
	Industrial	Reliance on polluting industries for jobs and economic development. If the community is reliant on polluting industries for jobs and tax revenue, there may be reluctance to take actions that would avoid risk to health and the environment at a cost to the industry. In addition, minority or low-income communities may not enjoy other benefits in proportion to the risks or impacts they bear.
	Brownfields	Communities with low revenues may be unable to finance economic rehabilitation efforts that would improve the physical environment of a community.
	Natural Resources	Reliance on natural resources for economic base (e.g., tourism, crops; use of resources to create salable items, such as woven baskets among Native Americans; subsistence and commercial fisheries).
	Other Indirect Effects	Low-income or minority population, due to economic disadvantage, may not be able to avoid, and may have a synergistic effect with other risk factors (e.g., vehicle pollution, lead-based paint poisoning, existence of abandoned toxic sites, dilapidated housing stock).

Cultural/Ethnic, Communication Concerns	Public Access	Whether community members have access to the decision-making process (i.e., whether the community is fairly represented on commissions, boards, etc., and whether the community is fairly made aware of their role in the decision-making process).
	Cultural Expectations	Cultural expectations concerning the decision-making process.
	Meaningful Information	Access to meaningful and understandable information, such as clear presentation of what a facility produces, what pollutants it releases, how these are managed, and the potential risk to the population.
	Job Security	Potential for fear within the community that participating in the process may jeopardize job security.
	Literacy Rate	<u>Clarity and accuracy of materials must be addressed in areas where low literacy exists. Increased speaking engagements and videos should be considered when this is identified</u>
	Translations	Consideration of non-English translations, both written and oral during community presentations or public meetings.
	Community Representation	Consideration should be given to whether representatives were selected by community decree or by outside sources without proper consultation with the community.

Source: U.S. Environmental Protection Agency, Office of Federal Activities, *Final Guidance For Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses*, April 1998

In addition to these site activities, based upon the archival information about the site (type, quantity and location of the materiel), the Non-Stockpile Product can begin to identify any potential local adverse impacts, in order to open dialogue and information with the community. Much of the information that will be required at locations has already been developed as part of the national outreach program conducted by Non-Stockpile Product. The Non-Stockpile Product already has established a toll-free phone number for information requests; conducted a number of site visits; sited 235 information repository locations; developed brochures, models, exhibits, videos and information papers; implemented a national speakers bureau; developed a national media strategy; and run newspaper advertising meetings and information availability. These information products, reference documents and speakers will be made available in new communities. As appropriate and available, additional information repositories will be placed in the communities to assist in the outreach to EJ populations and Tribal Governments in the same manner in which they have been provided in other communities nationwide.

The Non-Stockpile Product has established a number of communications strategies to support their efforts with public information and participation, including *Transportation Regulation Resource Book*, *NSCMP Overarching Public Involvement Strategy*, *NSCMP Outreach Plan for MMD-1 Testing*; *NSCMP Outreach Plan for RRS Testing*, and *NSCMP Environmental Justice*. The Non-Stockpile Product continues to work with a number of oversight and advisory groups including the National Research Council, the Non-Stockpile Citizen's Technology Evaluation Panel and the Non-Stockpile Core Group to identify and address potential concerns and issues relating to non-stockpile activities.

For Tribal governments, initial contacts will be made with the identified points of contact, in order to begin a consultation process about the Non-Stockpile activities. Consultation visits initiated by PMCD/Non-Stockpile Product will be prompted by site-specific project schedules as outlined in *PMCD's Public Involvement Policy Strategy for Tribal Interactions*, October 1998. This document includes the ongoing consultation goals set forth by PMCD with procedures for (1) Visits to Reservations, (2) Routine Written Matters with Tribal Officials, (3) Tribal Visits to PMCD Facilities, and (4) Developing Information Materials Suitable for Tribal Audiences. The *Strategy* also provides for "Building Tribal Capacity to Make Decisions and Undertake Program Responsibilities," as well as evaluating the measures taken by PMCD in relation to Tribal information and involvement.

Additional direction and guidance will be based upon the draft *Guide on Consultation and Collaboration with Indian Tribal Governments* produced through a work group of the National Environmental Justice Advisory Council, May 2000.

Stage Three: Site-Specific Implementation

The third stage of activities to be undertaken by the Non-Stockpile Product will consist of developing site-specific plans, implementing the outlined interactions and activities to

ensure adequate measures are made to identify and involve EJ populations and Tribal governments. These plans will document the activities and interactions identified by the community, as well as EJ populations and Tribal governments to address the perceived or potential impacts of Non-Stockpile activities and the issues and concerns that arise.

At sites where there is an existing military presence, the Non-Stockpile Product will coordinate with and gain approval from the base commander before any interactions with the community. The site-specific implementation will be based upon any existing EJ or Tribal strategies and interactions that are already underway at the site. The Non-Stockpile Product will obtain any historic data that can provide insight into the potential issues or concerns within the communities, as well as previous Federal interactions and their lessons learned. At the two sites that are also PMCD Stockpile sites (Anniston, AL and Pine Bluff, AK), the Non-Stockpile Product will work within the already defined relationships between PMCD and those sites to address any EJ or Tribal issues resulting from non-stockpile activities.

Each of the site-specific plans will be based upon the technical program schedules, in order to provide for sufficient outreach and interaction the decision-making process in prior to selections on treatment, technology, transportation or disposal. Based upon community feedback and interactions, the plans will be reviewed and updated as long as any activity at the site is planned or underway. All actions and outreach activities will be documented in order to maintain an institutional record and lessons-learned to benefit future sites where Non-Stockpile activity occurs.

Tribal government interactions will be determined based upon consultation and coordination initiatives outlined with any identified Tribal governments and their representatives. While many of the same activities may be considered, the Non-Stockpile Product recognizes the distinctive requirements and rights of American Indian / Alaska Native governments. The Non-Stockpile Product will work to involve Tribal governments in the decision-making process in a manner that meets their specific needs.

At each site, the Non-Stockpile Product will conduct exit interviews with the civic, government, citizens and environmental advocacy groups, as well as key persons within the identified EJ populations and Tribal governments to gain feedback on the experience and interactions to ensure that there are not ill feelings or ensuing issues or concerns. This feedback will be added as an addendum to the site-specific plans for use in future planning activities, as well.

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