

A stylized illustration with a warm, sunset-like background. In the center is a large, light-colored silhouette of Lady Justice, holding a sword and scales. Below her, silhouettes of a person jumping, a child playing with a ball, and two people sitting on a bench are visible. The scene is framed by green and yellow leaves at the top and bottom. The text "COMPREHENSIVE ENVIRONMENTAL JUSTICE ENFORCEMENT STRATEGY SECOND ANNUAL REPORT" is overlaid in white, bold, sans-serif font.

COMPREHENSIVE ENVIRONMENTAL JUSTICE ENFORCEMENT STRATEGY SECOND ANNUAL REPORT

December 2024

The Environmental Justice Enforcement Steering Committee

The [Comprehensive Environmental Justice Enforcement Strategy](#) directs the Steering Committee to provide leadership for implementing the Strategy and to make recommendations to Department of Justice leadership on all aspects of the Department's efforts to advance environmental justice.

Steering Committee Members

OFFICE OF THE ATTORNEY GENERAL

OFFICE OF THE DEPUTY ATTORNEY GENERAL

OFFICE OF THE ASSOCIATE ATTORNEY GENERAL

BUREAU OF PRISONS

FEDERAL BUREAU OF INVESTIGATION

CIVIL DIVISION

CIVIL RIGHTS DIVISION

COMMUNITY RELATIONS SERVICE

ENVIRONMENT AND NATURAL RESOURCES DIVISION

EXECUTIVE OFFICE FOR UNITED STATES ATTORNEYS

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OFFICE OF JUSTICE PROGRAMS

OFFICE OF LEGAL POLICY

OFFICE OF TRIBAL JUSTICE

UNITED STATES ATTORNEY'S OFFICE FOR THE EASTERN DISTRICT OF LOUISIANA

UNITED STATES ATTORNEY'S OFFICE FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES ATTORNEY'S OFFICE FOR THE SOUTHERN DISTRICT OF NEW YORK

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OVERVIEW



Attorney General Merrick Garland honors the Jackson Water Outreach Team at the 71st Annual Attorney General's Awards. Photo credit: DOJ/OPA

On May 5, 2022, the U.S. Department of Justice (DOJ or the Department) issued its Comprehensive Environmental Justice Enforcement Strategy (Strategy). This second annual report details the efforts of numerous components and the Office of Environmental Justice (OEJ) to continue its implementation. The Department is proud to share our progress in the work to advance environmental justice under the Strategy.

OEJ was established to engage DOJ bureaus, components, and offices in the collective pursuit of environmental justice (EJ) to deliver results to communities long impacted by pollution and other environmental harms. The information contained within this report covers fiscal year 2024 (FY 2024) and is therefore current through September 30, 2024.

In FY 2024, the Strategy continued to serve as the Department's environmental justice roadmap under four principles. First, we prioritize cases that reduce public health and environmental concerns in overburdened and underserved communities. Second, we use all available tools to address environmental

injustices. We meaningfully engage with impacted communities by building trust and listening to their concerns while ensuring the relief we seek through enforcement addresses the harms they face. Finally, we pledge to be transparent about our EJ efforts, as well as our results. These four principles guide the Department's efforts toward environmental justice, aiming for consistency and clarity in the work.

In addition, the Strategy identified specific actions needed to continue the work to secure environmental justice. The Department formed teams of DOJ employees working together to advance particular EJ initiatives and priorities. Department components and personnel also strengthened relationships within and outside of DOJ to identify areas of greatest concern to affected communities and to ensure timely and effective remedies for environmental violations.

The Department continues to promote the principles of the Strategy, now incorporated into its new [EJ Strategic Plan](#), to help address the barriers historically faced by communities with environmental justice concerns.

PRINCIPLE 1: Prioritize cases that will reduce public health and environmental harms to overburdened and underserved communities.

The following section spotlights six areas related to the first principle of the Strategy. The areas discussed are: (1) enforcement actions brought by several DOJ components; (2) updates on the Environmental Justice Enforcement Steering Committee; (3) assessing EJ impacts during investigations; (4) the pursuit of Tribal EJ; (5) environmental enforcement task forces; and (6) coordinating with other federal agencies.

Enforcement Actions

In FY 2024, the Department continued to identify and prioritize cases with the potential to significantly reduce environmental and public health harms or injury to natural resources in overburdened and underserved communities. In the matters below, DOJ's enforcement of federal law, often in coordination with federal agency partners, achieved or seeks to achieve meaningful relief to address environmental harms, violations, or contamination.

Environment and Natural Resources Division

The Environment and Natural Resources Division (ENRD) is a litigating component of the Justice Department. ENRD enforces the nation's civil and criminal environmental laws, including the Clean Air Act (CAA), Clean Water Act (CWA), and hazardous waste laws. It also protects the nation's natural resources and handles cases related to Tribal rights and resources.

Environmental Crimes Section

One of ENRD's sections is the Environmental Crimes Section (ECS), which brings criminal cases against individuals and corporations that have violated laws designed to protect the environment, worker safety, and animal welfare. The Section works closely with the [U.S. Attorneys' Offices \(USAO\)](#) as well as with criminal investigators from the U.S. Environmental Protection Agency (EPA), the U.S. Department of the Interior's Fish and Wildlife Service, and the [Federal Bureau of Investigation \(FBI\)](#). An example of ECS's FY 24 work is:

Jobs Bay Wetlands Cases – Puerto Rico. In partnership with the USAO for the District of Puerto Rico, ECS obtained indictments against three individuals for participating in illegal construction projects that involved dumping fill material into protected wetlands and water that are part of the Jobs Bay National Estuarine Research Reserve near the Las Mareas community of Salinas, Puerto Rico. Congress enacted the CWA in 1972 to protect and maintain the integrity of the waters of the United States. It prohibits the discharge of any pollutant and fill material into waters of the United States, except when a permit is obtained from the United States.

ECS and USAO Puerto Rico previously obtained [indictments](#) against two other individuals. This year, all five charged individuals pleaded guilty. Three of the men were [sentenced](#) in September 2024 to varying terms of imprisonment and collectively fined over \$14,000. The FBI investigated the cases along with other members of the recently created federal [Caribbean Environmental Crimes Task Force](#).

Environmental Enforcement Section

The Environmental Enforcement Section (EES), another ENRD section, is responsible for bringing civil enforcement actions under most federal laws enacted to protect public health and the environment from the adverse effects of pollution, such as the Clean Air Act (CAA), CWA, Safe Drinking Water Act, Oil Pollution Act, Resource Conservation and Recovery Act, and Superfund law (i.e., the Comprehensive Environmental Response, Compensation, and Liability Act, or CERCLA). In any given year, EES's cases secure injunctive relief valued in the billions of dollars and money judgments totaling hundreds of millions of dollars. EES's cases are generally based on referrals from EPA or other federal agencies. Some of the Section's cases with EJ implications are discussed below.

Cleveland-Cliffs Steel Corporation

(formerly AK Steel) – Michigan. In October 2023, the United States and the State of Michigan agreed to modify a 2015 consent decree with Cleveland-Cliffs Steel Corporation (formerly AK Steel) to address and resolve CAA violations at the company's Dearborn, Michigan plant. The 2015 decree required the Dearborn plant to implement measures to address visible air emissions from the plant. Because these measures failed to bring the plant into full compliance with the CAA, the 2023 modification requires Cleveland-Cliffs to undertake additional extensive measures at a cost of over \$100 million. It requires Cleveland-Cliffs to replace essential equipment and institute routine testing of the replacement equipment to assure compliance with pollution limits.

In addition, Cleveland-Cliffs will pay a civil penalty of \$81,380 to the State of Michigan for violations of state permit limits. The company will also implement a state-law supplemental environmental project in which Dearborn residents living near the plant will receive home air purifiers.

The new requirements are expected to reduce visible emissions from the plant, as well as curtail emissions of manganese and lead. Inhalation of lead and manganese can cause numerous negative health effects, including impacts to the central nervous system. Inhalation of lead has also been linked to impacts to kidney function, and to the immune, cardiovascular, reproductive, and developmental systems in humans. The stronger consent decree will result in better air quality for the residents of Dearborn who have been disproportionately burdened by pollution.

Heritage Crystal Clean – Nationwide.

In December 2023, EES attorneys settled Resource Conservation and Recovery Act (RCRA) and state law claims against Heritage-Crystal Clean LLC (HCC). The settlement resolved a complaint filed in 2022 alleging that while providing parts-washing services to customers throughout the United States, HCC accepted used solvent that qualified as hazardous waste. It is alleged that HCC transported and managed those solvents in a manner inconsistent with applicable hazardous waste management requirements. The United States contends HCC evaded those requirements by improperly claiming that its unusable solvents were products instead of wastes.

Under the terms of the consent decree, HCC must achieve and maintain conformity with RCRA at five HCC facilities. It also requires HCC to pay civil penalties totaling \$1,162,500. The HCC facilities included in the settlement are located within communities with environmental justice concerns. These communities will benefit from the enhanced controls and new work practices that will reduce releases of volatile organic compound emissions and reduce the risk of exposure to the hazardous wastes managed at these facilities.

Osage Pipe Line Co. – Oklahoma. In January 2024, the United States settled Clean Water Act claims against Holly Energy Partners – Operating, L.P. and Osage Pipe Line Company, LLC stemming from a pipeline rupture and crude oil spill from the Osage Pipeline onto land owned by members of the Sac and Fox Nation in Oklahoma. Under the terms of the settlement, defendants agreed to pay a civil penalty of \$7.4 million, committed to clean up and remediate the impacted area, and to take additional steps to prepare for and prevent future spills.

The complaint alleges the spill occurred when a segment of the pipeline ruptured adjacent to Skull Creek, about five miles north of Cushing, Oklahoma. The Pipeline was operating at the time of the rupture and discharged about 300,000 (7,110 barrels) gallons of crude oil into the creek. The land where the rupture occurred, and the adjacent downstream parcel that the creek runs through, are allotment lands owned by members of the Sac and Fox Nation. EPA, the U.S. Department of Transportation’s Pipeline and Hazardous Materials Safety Administration (PHMSA), the U.S. Department of the Interior’s (DOI) Bureau of Indian Affairs, and the Sac and Fox Nation all responded to the rupture and spill.

The companies are continuing clean-up work in Skull Creek under EPA’s oversight, and the Pipeline has returned to operation at reduced pressure under the oversight of PHMSA. The Sac and Fox Nation deployed Tribal monitors to observe the companies’ work at the spill site and to monitor for impacts to natural and cultural resources. In addition, the defendant companies will be required to improve their pipeline integrity management program, provide additional training for all their control room operators, and expand their spill notification efforts for Tribal governments with land interests within the footprint of the Pipeline.

Lower Duwamish River Settlement – Washington. In March 2024, the Elliott Bay Trustees (the United States on behalf of the National Oceanic and Atmospheric Administration, DOI’s Fish & Wildlife Service, the State of Washington on behalf of the Department of Ecology and Department of Fish and Wildlife, the Muckleshoot Indian Tribe, and the Suquamish Indian Tribe of the Port Madison Reservation) settled natural resource damages claims against General Recycling of Washington, LLC and its affiliates for natural resource injuries caused by the release of hazardous contaminants into Seattle’s Lower Duwamish River. Under the settlement, the companies will construct and maintain a habitat restoration project at the General Recycling facility, located on the west bank of the Lower Duwamish River. The restoration project will provide nearly three acres of off-channel habitat for fish and other wildlife and natural resources injured by contamination. This habitat will provide refuge areas and food sources for wildlife and various fish species.

The settlement also requires the companies to pay more than \$360,000, for costs incurred by the Trustees to assess natural resource damages in the river. The settlement will restore vital habitats, fisheries, and wildlife injured by the pollution at the site. Clean and productive waterways are vital to tribal and local communities for their cultural and economic well-being and the restoration will benefit those disproportionately impacted by pollution.

Texas Petrochemical Company (TPC) Group LLC – Texas. This Clean Air Act (CAA) civil action involving TPC’s petrochemical manufacturing facility in Houston, Texas was prompted by a November 2019 explosion incident at its Port Neches facility, which led to the company facing a felony criminal charge. The civil violations stem from TPC’s failure to take needed measures to prevent the explosion at the Port Neches facility, and its failure to implement the systems it developed for managing risk at both facilities.

Under section 112(r) of the CAA, regulated facilities must identify hazards, design and maintain a safe site, minimize the consequences of accidental releases that occur, and comply with regulatory prevention measures. The failure to comply with these requirements increases the risk of accidents and threatens surrounding communities. These communities, such as the Allendale neighborhood where TPC's Houston Facility is located, are frequently overburdened with pollution.



A process tower is shown airborne after exploding at the TPC Group Petrochemical Plant in Port Neches, Texas. Photo credit: Reuters/Erwin Seba

Pursuant to a settlement agreement entered in May 2024, TPC agreed to pay \$12.1 million in civil penalties. This represents the third largest CAA Section 112(r) settlement in history, following the 2010 BP Products and 2019 Chevron matters, respectively. TPC Group will also spend approximately \$80 million to improve its risk management program and remediate safety issues at both facilities, host community meetings about continuing risk, publicly release incident reports, and provide data from fence line air monitors in the community surrounding the facilities.

Marathon Oil – **North Dakota.** In July 2024, the United States resolved CAA violations by Marathon Oil Company with a record-setting settlement. The United States alleged that Marathon violated the CAA at the company's oil and gas production operations on the Fort Berthold Indian Reservation in North Dakota. The United States claims that Marathon's

violations resulted in large amounts of illegal pollution including volatile organic compounds (VOCs) and carbon monoxide. Additionally, the violations led to extensive greenhouse gas emissions. The case is the first of its kind against an oil and gas producer for alleged violations of major source permitting requirements under the CAA's Prevention of Significant Deterioration (PSD) program.

Under the July agreement, Marathon will pay a civil penalty of \$64.5 million – the largest civil penalty ever for CAA violations at stationary sources – and implement extensive compliance measures to achieve major reductions in harmful emissions from its 200 facilities across North Dakota. The work that Marathon will do under the settlement will eliminate nearly 110,000 tons of VOC emissions and result in the equivalent of over 2.25 million tons of reduced carbon-dioxide emissions over the next five years, similar to the number of reductions achieved by taking 487,000 cars off the road for one year.

Marathon will also invest in extensive compliance measures, which are estimated to cost \$177 million. The settlement requires Marathon to monitor its flares to ensure that pollution is not venting directly to the sky, implement storage tank design requirements to reduce pollution, and conduct periodic infrared camera inspections to detect and repair leaks. These actions will significantly reduce harmful health-related emissions from 169 existing facilities on state land and on the Reservation, as well as at new facilities built in North Dakota. The settlement furthers the United States' goal of addressing environmental concerns in communities already overburdened by pollution.

Lima Refining Company – Ohio. In September 2024, the United States announced a settlement with the Lima Refining Company (LRC) to address violations of the CAA at its refinery in Lima, Ohio. Under the settlement, LRC must pay a civil penalty of \$19 million and implement an estimated \$150 million in capital investments, including control technology expected to reduce emissions of benzene by an estimated 4.34 tons per year, other hazardous air pollutants (HAP) by 16.26 tons per year, and other VOC emissions by 219 tons per year. As part of the settlement, LRC will install one or more flash columns to reduce benzene in wastewater streams leading to its wastewater treatment plant and will cease operating, replace, or upgrade other units at the refinery. LRC will also install six air pollutant monitoring stations to monitor air quality outside of the refinery fence line and will make the results publicly available.

Ovintiv USA, Inc. – Utah. In September 2024, the United States lodged a \$16 million settlement with Ovintiv USA Inc. resolving CAA violations at the company’s oil and gas production facilities on the Uintah and Ouray Reservation in Utah and on Utah state lands. These violations resulted in illegal emissions of VOCs, which contribute to asthma and increase susceptibility to respiratory illnesses. Additionally, greenhouse gases, including methane, were released in large quantities, contributing to climate change.

The settlement requires Ovintiv to pay the United States and Utah a civil penalty of \$5.5 million. It also requires Ovintiv to reach compliance with the CAA and complete mitigation projects (projects that attempt to offset the illegal pollution previously emitted) estimated to cost over \$10 million. These projects will eliminate over 2,000 tons of VOC emissions annually. It will also eliminate methane emissions equivalent to a reduction of over 50,000 tons of carbon dioxide emissions annually, a reduction similar to taking nearly 13,000 gas powered cars off the road each year.

United States Attorneys’ Offices

The United States Attorneys’ Offices (USAOs) work to enforce federal laws throughout the country. The President appoints a U.S. Attorney to each of the 94 federal districts. The U.S. Attorneys serve as the nation’s principal litigators under the direction of the Attorney General. U.S. Attorneys and their offices play a vital role in the effective implementation of the Strategy as EJ issues often occur in communities with which USAOs are most familiar. Civil and criminal prosecutors in the USAOs and their partners handled the following environmental justice matters during the second year of the Strategy:

James Hodge Motors, Inc. – Texas. Nine men and their company were indicted for selling and installing aftermarket devices to effectively turn off pollution control equipment in vehicles, in violation of the Clean Air Act. These “defeat devices” permit a car or truck to emit the volume of pollutants normally emitted by hundreds or thousands of compliant cars by removing or disabling required emissions controls in motor vehicles. The air pollution is found to be greatest along highways, affecting the communities that live near them.

Rudy’s Performance Parts, Inc. – District of Columbia and North Carolina. An auto parts seller and its owner agreed to an injunction and to pay \$10 million in criminal and civil fines, after illegally modifying approximately 300 diesel trucks with similar aftermarket “defeat devices.”

Arconic Corporation, Navistar Inc. and Ford Motor Company – Indiana. The defendant companies agreed to pay a total of \$1.37 million to clean up decades of contamination from oil and numerous other hazardous materials in the soil, groundwater, and storage tanks at an EPA Superfund Site on the southwest side of Indianapolis, Indiana.

West Virginia Environmental Services, Inc. (WVES) – West Virginia. WVES was fined the maximum penalty of \$500,000 and placed on corporate probation for three years for causing leaching of industrial waste into the Kanawha River. The company’s owner was sentenced to one year of home confinement, placed on five years’ probation, and fined \$10,000. WVES owned and managed an industrial waste landfill, but failed to properly collect and treat the leachate, which is formed when rainwater filters through waste placed in a landfill. When the water meets the buried waste, it leaches, or draws out, chemicals from that waste. For the safety and health of the surrounding communities, this contaminated liquid must be properly treated prior to discharge into a stream or tributary.

Westchester Joint Water Works, Town/Village of Harrison, Village of Mamaroneck, and Town of Mamaroneck – New York. Municipal water authorities agreed to construct a \$138 million water treatment facility, take steps to protect source water quality, pay a total of \$1.25 million in civil penalties, and spend at least \$7.7 million on state-law supplemental environmental projects in response to a civil lawsuit filed in the Southern District of New York (SDNY). The lawsuit alleges violations of the Safe Drinking Water Act due to the presence of contaminants in the public water system at a higher level than that set by EPA. It further alleged that the three municipalities violated a previous EPA administrative order requiring the construction of a water filtration plant by specified deadlines.

City of Mount Vernon – New York. SDNY secured a settlement agreement with the City of Mount Vernon, New York to resolve ongoing litigation regarding Mount Vernon’s non-compliance with Clean Water Act requirements for municipal storm sewers, which has caused raw sewage to be discharged into the Bronx and Hutchinson Rivers.

Many municipalities operate “municipal separate storm sewer systems” (or MS4s) that carry storm water and discharge it into nearby waters. A municipality is required by its MS4 permit to maintain a program for identifying and then eliminating any raw sewage or other illicit pollutants from flowing into the storm sewers.

Apex Building Company, Inc. (APEX) – New York. A settlement agreement resolved a civil lawsuit filed against APEX. The lawsuit alleged violations of the Toxic Substances Control Act and EPA’s Renovation, Repair, and Painting Rule (“RRP Rule”). The agreement includes a \$606,706 civil penalty. This is the second largest civil penalty ever imposed under the RRP Rule and requires APEX to take steps to mitigate potential harms caused by its conduct.

Magellan Diagnostics, Inc. and Amy Winslow, Hossein Maleknia, and Reba Daoust – Massachusetts. A medical device company headquartered in Billerica, Massachusetts pled guilty and agreed to pay \$42 million to resolve criminal charges related to its concealment of a device malfunction that produced inaccurately low lead test results for potentially tens of thousands of children and other patients. Three of the company’s former executives were also charged with conspiracy, wire fraud, and Food and Drug Administration violations stemming from the same allegations.

Christopher Lee Carroll – Missouri. A business owner from Farmington, Missouri was found guilty of pandemic fraud, witness tampering, and Clean Air Act violations. The defendant illegally diverted nearly \$3 million in pandemic relief funds to start his own trucking business and illegally modified the emissions controls in the fleet of trucks he purchased with the money. Carroll also fraudulently used the money rather than paying his employees or maintaining their health insurance. The [FBI](#) and EPA’s Criminal Investigation Division investigated the case.

[Prive Overseas Marine LLC and Prive Shipping Denizcilik Ticaret – Louisiana.](#)

Two oil tanker companies pled guilty in New Orleans to obstruction and agreed to pay \$2 million for fabricated logs. The companies falsified the ship’s Oil Record Book to conceal the dumping of oil-contaminated waste overboard, in violation of maritime laws and an international treaty.



Exhibit 1 in U.S. v. Prive Overseas Marine, LLC and Prive Shipping Denizcilik Ticaret. Photo credit: U.S. Coast Guard

[Lower Yakima Valley Dairies –](#)

Washington. DOJ and EPA sued three large dairies in Eastern Washington for violating the Safe Drinking Water Act and a 2013 agreement the dairies had with EPA. The United States alleged that the Lower Yakima Valley dairies failed to control nitrate contamination from their operations. The agreement required the dairies to control nitrate run-off from their facilities and to protect residents, including farmworkers, from contaminated well water.

These matters brought by USAOs around the country target practices – the use of defeat devices, illegal waste dumping, and negligence that results in air or water contamination – which often disproportionately impact communities already facing significant environmental and public health harms.

Environmental Justice Enforcement Steering Committee

DOJ’s Environmental Justice Enforcement Steering Committee was formed to ensure coordination among the components and to provide leadership and guidance for the implementation of the tasks outlined in the Strategy. It is co-chaired by the Assistant Attorneys General of ENRD and the Civil Rights Division. The Committee also includes leaders from the Office of the Attorney General, the Office of the Deputy Attorney General, and the Office of the Associate Attorney General, as well as the Civil Division, the Executive Office for U.S. Attorneys, the Office of Justice Programs, the Office of Legal Policy, the Office of Tribal Justice, the Office for Access to Justice, Community Relations Service, Bureau of Prisons, the Federal Bureau of Investigation, and the U.S. Attorneys’ Offices for the Eastern District of Louisiana, Eastern District of Washington, and the Southern District of New York.

Additionally, a Steering Committee Workgroup comprised of staff designated to represent their component leaders, was established. The component leaders, or principals, meet twice a year to receive recommendations from the Workgroup and to make determinations on policy choices, budget priorities, training needs, and to aid coordination with government partners.

[Principal Meetings](#)

In FY 2024, the principals held meetings in December 2023 and June 2024. In December, component leaders heard inspiring reports of the EJ work accomplished in 2023, which focused on the use of the Department’s authorities to protect children and workers from lead paint poisoning. Meeting contributors included speakers from the U.S. Attorney’s Office for the District of Massachusetts, the Civil Division, and Community Relations Service.

The group also set an environmental justice goal for each member's division or office for the upcoming year and considered how to develop the Department's forthcoming [EJ Strategic Plan](#).

In June of this year, the group reconvened and shared updates on the progress of the 2024 component EJ goals. June's featured speakers shared the efforts made and results achieved on workforce and consumer safety issues. The Committee was apprised of the EJ training initiatives developed for Department attorneys and professional staff and heard recommendations on and reviewed the metrics for DOJ's draft EJ Strategic Plan.

In addition to the bi-annual principals' meetings, the Steering Committee Workgroup met at least once a month to routinely exchange information on EJ issues and cases for awareness, inspiration, and to promote coordination on EJ throughout the Department. Below is a FY 2024 highlight from the FBI, one of the Steering Committee's law enforcement participants.

FBI Environmental Justice Highlights

The FBI is the principal investigative arm of the Justice Department and a member of the U.S. Intelligence Community. It has the authority and responsibility to investigate crimes assigned to it and to provide other law enforcement agencies with cooperative services. It works with its local, state, and federal partners to investigate criminal cases against individuals and businesses that have violated U.S. laws intended to protect the environment, human health, and worker safety.

During FY 2024, the FBI participated in an EJ working group, with other components of DOJ and with EPA, to discuss potential criminal cases of shared interest. The FBI has continued to expand its case portfolio and membership in both formal task forces and informal working groups to address a variety

of environmental violations, including those impacting EJ. Currently, the FBI is participating in 28 interagency environmental working groups and [task forces](#) across the country. The FBI also assigned an analyst full-time to ENRD's [Environmental Crimes Section](#) to strengthen the FBI's capabilities on environmental issues.

In the fourth quarter of FY 2024, the FBI set a record for the number of environmental crime matters it opened in a single quarter. One of the agency's EJ matters recently resulted in a guilty plea for crimes related to the illegal construction and deposit of materials into [wetlands](#) impacting the Las Mareas community of Salinas, Puerto Rico.

Finally, in an effort to promote public awareness on its EJ enforcement efforts, the FBI published a [webpage](#) dedicated to environmental crime under "What We Investigate" with the aim of communicating to the public and its partners and potential recruits about its work to combat environmental crime and associated EJ violations.

Assessing EJ Impacts During Investigations

As Department components develop enforcement cases pursuant to the Strategy, the Office of Environmental Justice (OEJ) works with components to help federal investigative agencies identify and assess EJ impacts during their investigations. These initial steps improve interagency information sharing and coordination for enforcement work affecting overburdened communities. The next section provides examples of how components strived to evaluate adverse effects on communities with EJ concerns before and during the investigatory stage.

Lead Paint Workstream

During FY 2024, ENRD and OEJ have taken significant steps to increase the profile of judicial lead enforcement. Lead-based paint is typically found in poorly maintained buildings constructed prior to 1978. Exposure to dust from lead paint is the leading cause of lead poisoning in children under 6 years of age, according to the Centers for Disease Control. Judicial enforcement of federal rules requiring the disclosure of lead-based paint hazards and mandating lead-safe work practices is an important way to protect at-risk populations from lead exposure. Such regulations include EPA and the U.S. Department of Housing and Urban Development (HUD)'s Lead Disclosure Rules, EPA's Renovation, Repair, and Painting Rule, and its Lead Safe Housing Rule. In particular, judicial enforcement of these regulations allows for injunctive remedies that may not be available for administrative enforcement, which can include requirements to safely remove lead from the home.

Over the past year, the Department took several steps to develop a wider range of judicial enforcement. In January, a panel consisting of civil and criminal enforcement attorneys held a training session related to lead

paint for [U.S. Attorneys' Offices \(USAOs\)](#). ENRD developed and distributed model lead enforcement "request for representation" letters. The model letters are designed to help client agencies streamline the process of engaging a USAO in a lead investigation. ENRD also presented on judicial lead enforcement, including the efforts to lower barriers to referring matters to DOJ and to the National Lead Enforcement and National Lead Inspectors groups within EPA. ENRD also shared this information with HUD with the aim of aiding in case development.

ENRD has also researched lead data and reached out to USAOs to encourage potential development (with HUD and/or EPA) of lead enforcement cases where there is trustworthy data indicating hotspots with elevated blood lead levels. These efforts are essential to creating and sustaining a whole-of-government approach to prevent lead poisoning and have resulted in increased collaboration and enforcement action. ENRD, OEJ, the [Civil Rights Division](#), and more than 10 USAOs have partnered with EPA and HUD on a number of lead paint enforcement cases and investigations this year – nearly two dozen are being pursued in USAOs across the country. The USAO for the Northern District of Indiana launched an EJ initiative to open and pursue lead paint cases and investigations. The USAO for the Southern District of Indiana established an ongoing relationship with the Marion County Public Health Department to investigate and enforce lead-based paint violations in the Indianapolis area and performed public outreach regarding lead testing in communities with EJ concerns.

With sustained attention, stronger relationships can be built among HUD, EPA, and multiple components at DOJ. These interagency relationships can then help grow the role of judicial enforcement in addressing lead paint exposure and, in turn, significantly benefit communities with EJ concerns.

Tribal Environmental Justice

Indian Resources Section | Office of Tribal Justice

The Department of Justice is committed to Tribal sovereignty, the Nation-to-Nation relationship, and consultation with Tribal Nations including where this intersects with environmental justice. The Strategy recognizes the unique potential EJ impacts for Tribal communities including injury to cultural and sacred sites and resources or impacts to fisheries and traditional hunting and gathering areas.

Highlights from the Tribal Environmental Justice Workstream, involving members of the Office of Tribal Justice (OTJ), ENRD's Indian Resources Section, and others, are discussed in this section. ENRD's Indian Resources Section litigates to protect almost 60 million acres of lands held in trust for Tribes and individual Indian lands, as well as the rights and resources associated with those lands. DOJ's Office of Tribal Justice was formed in response to requests from Tribal leaders for a dedicated point of contact for Indian country-specific legal and policy matters and advises the Department on the treaty and trust relationship and other Tribal interests.

In FY 2024, OTJ developed a [draft Tribal Environmental Justice Policy](#) that underwent Tribal consultation. The goal of the Policy is to communicate the Department's commitment to ensuring that Tribal sovereignty, Tribal treaty and reserved rights, impacts to water, land or cultural resources needed to support Tribal homelands, places of religious or cultural significance, and the federal trust responsibility to Tribes are considered when identifying and addressing EJ concerns. The policy would provide clarity for Department components on how to identify a Tribal EJ matter and create a cohesive approach to Tribal matters.

OTJ partnered with OEJ to hold two sessions on the policy and the Department's draft [EJ Strategic Plan](#) during a Tribal consultation, which began on May 8, 2024 and concluded on August 16, 2024. This consultation period included an in-person and a virtual session. DOJ also accepted written comments from Tribes. The focus of the consultation was DOJ's environmental justice work in Tribal communities broadly, as well as the draft Tribal EJ Policy and the draft EJ Strategic Plan.

The Department received thorough feedback on the topics that formed the Tribal consultations. For example, one of the questions raised was whether the Tribal EJ Policy should be incorporated into the EJ Strategic Plan or serve as a standalone guidance document. Based on the Tribal input received, the documents were kept as separate publications. DOJ continues to consider and integrate additional comments as it finalizes the Tribal EJ Policy. A forthcoming consultation report will be available on OTJ's Tribal Consultations & Advisory Groups [webpage](#).

Also, in FY 2024, ENRD and OTJ hosted a series of regional Federal/Tribal Environmental Justice Summits to further explore ways to improve DOJ and federal agency litigation outcomes for cases involving Tribal water rights, treaty rights, and defense of Tribal homelands. These events built upon a 2022 Tribal Listening Session, when ENRD and OTJ began a planned approach to work with Tribal government representatives to explore how DOJ can identify and prioritize affirmative litigation involving Tribal EJ issues. Between August 2023 and August 2024, summits were held in Minnesota's Twin Cities, Albuquerque, New Mexico and San Bernardino, California. During the summits, Tribal leaders expressed concern over trespass onto Tribal lands, diminishing water supplies for Tribal homelands, and the theft and trafficking of culturally significant items.

Another highlight from the year was the 2024 Tribal Justice, Safety, and Wellness Summit, hosted by the Department of Justice and the U.S. Department of the Interior, which drew hundreds of participants. The three-day virtual event featured panels and presentations on public safety issues. ENRD personnel, including the Deputy Assistant Attorney General, served as instructors.

Environmental Enforcement Task Forces

Environmental enforcement task forces are force multipliers, serving to combine human and technological resources and contribute to successful investigations and prosecutions. Given the reality of scarce resources, a task force can be an effective way of focusing and coordinating enforcement efforts.

In FY 2024, the Environmental Enforcement Task Forces Workstream continued to foster participation in task forces, encourage existing task forces to incorporate environmental justice principles, and establish and reinvigorate task forces where they did not exist or have become dormant.

The Task Forces Workstream compiled existing guidance, success stories, and other resources for use by [U.S. Attorneys' Offices](#) (USAOs) hosting, participating in, or starting environmental task forces. Workstream participants have joined USAO environmental justice coordinators training sessions to publicize the available resources. The Workstream is also generating methods to assist task force participants with communicating ideas and improving effectiveness.

The Task Forces Workstream members and ENRD's [Environmental Crimes Section](#) participated in environmental crimes task forces nationwide, including the New England Environmental Task Force, the National

Capital Region Environmental Crimes Task Force, the Michigan Environmental Justice and Enforcement Task Force, and the Minnesota Environmental Crimes Task Force. The efforts of the Caribbean Environmental Crimes Task Force, which launched in 2023, resulted in prison sentences and hefty fines in September 2024 for the destruction and filling of the protected wetlands in the [Jobos Bay National Estuarine Research Reserve](#) in violation of the Clean Water Act.

FY 2024 also saw the launch of new task forces including the West Virginia Environmental Justice Task Force and the Eastern Washington Environmental Crimes Task Force. The West Virginia EJ Task Force is comprised of federal and state law enforcement agents and officials including USAOs for the Northern and Southern Districts of West Virginia, EPA's Office of Inspector General (OIG) and Criminal Investigation Division (CID), EPA Region 3, HUD OIG, the WV Department of Environmental Protection, and the WV Office of Environmental Health Services. The group is growing and continues to work together to identify EJ concerns early in an investigation, engage members of the public, and craft specific EJ remedies. The USAO for Eastern District of Washington, in collaboration with EPA CID and the State of Washington Attorney General's Office, launched the Eastern Washington Environmental Crimes Task Force in March 2024.



Launch of EDWA Task Force in March 2024. Photo credit: Eastern District of Washington USAO

The Task Force leverages partnerships between local, state, and federal agencies to effectively investigate and prosecute environmental crimes and cases that impact public health and safety. It engages multiple state and federal agency partners in information sharing regarding environmental crimes, with monthly meetings to discuss specific cases, issues, and focus areas.

For example, in FY 2024, EDS defended an EPA rule that will reduce air emissions of ethylene oxide, a human carcinogen, thereby benefiting the substantially overburdened community living near the regulated facilities. EDS is currently defending another EPA hazardous air pollution rule that would reduce cancer risks to communities with environmental justice concerns.

Coordination with Other Federal Agencies

Many federal agencies have regulatory, enforcement, cleanup, or restoration authorities that can contribute to providing timely and effective remedies for environmental violations, contamination, and injury to natural resources. One of the Department's roles is to defend key regulations and decisions made by other federal agencies. The Strategy reminds DOJ components of the responsibility to advance environmental justice and ensure timely remedies when counseling federal agencies that face allegations of environmental violations or that have environmental cleanup obligations which may impact overburdened or underserved communities.

Environmental Defense Section

One of the sections whose primary involvement in environmental justice has been defending against challenges to EPA rules that have significant EJ benefits is ENRD's Environmental Defense Section (EDS). The section handles a diverse docket of cases that arise in federal district courts and the courts of appeals under such statutes as the Clean Air Act and the Clean Water Act, as well as statutes governing pesticides, drinking water, toxic substances, and the management and cleanup of hazardous wastes.

PRINCIPLE 2: Make strategic use of all available legal tools to address environmental justice concerns.

During FY 2024, the Department continued to use its enforcement authorities and tools to help remedy environmental violations and contamination, including finding innovative and strategic ways to achieve meaningful results for impacted communities. While these tools certainly include [enforcement actions](#) under traditional environmental statutes, they may also include actions under civil rights laws, worker safety and consumer protection statutes, and the False Claims Act. This section discusses cases that offer additional remedies employed to deliver effective relief to overburdened and underserved communities and to deter future violations. It also considers other utilized tools that are outside of traditional environmental protection laws.

Finally, this section examines the Strategy's charge to assess existing training and reference materials and courses and to identify training needs related to EJ enforcement.

Pursuit of Timely and Effective Remedies in Enforcement Matters

In accordance with current DOJ and EPA policies, the Department continued to incorporate more mitigation projects and supplemental environmental projects (SEPs) into settlements. SEPs are environmentally beneficial projects that are strongly connected to the alleged violations and are not otherwise required by law. A defendant may agree to complete a SEP as a component of the settlement of an enforcement action. For example, BP Products North America Inc. (BP Products) agreed to participate in a SEP as part of a settlement reached with the United

States and co-plaintiff State of Indiana. The agreement resolved Clean Air Act claims against the oil and natural gas producer. The settlement addressed excess emissions of benzene, other hazardous air pollutants (HAPs), and volatile organic compounds (VOCs) at the company's Whiting Refinery in Indiana.

As part of its SEP, BP Products agreed to spend \$5 million to replace diesel transportation vehicles, such as school buses, owned by local governments and non-profits with cleaner fuel vehicles. BP Products will also implement injunctive relief valued at more than \$197 million and pay a then record-setting penalty of \$40 million. The funding will be directed by community advisory groups established for this purpose.

The settlement will reduce emissions of HAPs and VOCs by 400 tons per year and require the installation of air monitoring stations in the community, outside the refinery fence line. Data from the monitoring stations will be made available to the public. The communities surrounding the Whiting Refinery have environmental justice concerns and the case team shared information about the settlement with local community groups.

Also, during this fiscal year, ENRD continued its efforts in *United States v. City of Jackson* (S.D. Miss.) to enforce the Clean Water Act and protect the health and safety of residents in the City of Jackson, Mississippi. In the fall of 2023, the Division, the Mississippi Department of Environmental Quality, and the City of Jackson agreed to a stipulated order that addresses raw and undertreated sewage spills into homes, businesses, streets, and waterways. The order expedites needed sewer system repairs and brings the city's sewer system under control of an interim third-party manager.

It also builds upon ongoing efforts to stabilize the city's drinking water system and to deliver clean drinking water to Jackson communities, which have been disproportionately impacted by environmental harm and under-resourced city services. The agreement generated strong public participation, with almost 700 public comments collected via email, mail, and public meetings hosted by ENRD, the USAO for the Southern District of Mississippi, and other federal and state partners.

Use of Civil Rights Authorities

One of the aims of the Strategy is that through cooperation and engagement, Title VI of the Civil Rights Act of 1964 and other civil rights authorities are consistently and effectively enforced throughout the Department in a manner that will advance environmental justice. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs or activities that receive federal financial assistance. DOJ's Civil Rights Division advances Title VI compliance focused on allegations of discriminatory treatment related to environmental, public health, and quality of life issues.

In FY 2024, the Civil Rights Division handled over 20 matters that addressed allegations of public health, services, or environmental discrimination under various civil rights statutes. Those matters included investigations, community outreach, workshops, and crafting guidance documents.

Civil Division Enforcement

One of the continued considerations of the Strategy is how to employ the enforcement tools of the Civil Division to address adverse environmental and public health burdens on impacted communities. The Civil Division's legal practice includes both defensive and

affirmative litigation and its responsibilities include defending against challenges to federal programs, ensuring the federal government speaks with one voice in its view of the law, preserving the intent of Congress, advancing the credibility of the government before the courts, and protecting the U.S. Treasury. While its scope of responsibility largely lies outside traditional environmental protection laws, the Strategy contemplates its civil and criminal investigative tools used to address health and safety threats or to pursue violations of material non-compliance with environmental or public health-related requirements.

For example, the Civil Division's enforcement work protects consumers' health, safety, economic security, and personal information. Additionally, the Division handles cases designed to ensure that those with monetary and programmatic responsibilities to the federal government fulfill those responsibilities, including entities in bankruptcy that have decommissioning, reclamation, remediation, and maintenance and well monitoring obligations. The Civil Division also works to ensure that companies with a remediation responsibility clean up their environmental damage. This work helps to protect the interests of those who depend on the Gulf of Mexico for their livelihood, many of whom are members of communities with EJ concerns.

In FY 2024, the Civil Division, together with colleagues from ENRD, successfully secured a court order requiring federal oil and gas lessee Cox Oil to perform its maintenance and well monitoring obligations for its oil platforms in the Gulf of Mexico. The Civil Division also worked with the Cox Oil trustee to ensure the U.S. Department of the Interior can order previous lessees to undertake their decommissioning, reclamation, and environmental remediation obligations on Cox Oil's leases. The Division continues to work to preserve Cox Oil's and the previous lessees' estimated \$3.4 billion in decommissioning, reclamation, and environmental remediation obligations.

In February 2024, a food safety case provided an example of how the Civil Division’s enforcement tools can be utilized to address health and safety threats to consumers. The Division’s Consumer Protection Branch, in partnership with the USAO for the Eastern District of Arkansas, prosecuted the case against Family Dollar Stores, LLC, a subsidiary of Dollar Tree Inc. Family Dollar pled guilty to holding food, drugs, medical devices, and cosmetics under unsanitary, rodent-infested conditions.

The plea agreement entered in the case included a fine and forfeiture sentence totaling \$41.675 million, the largest-ever monetary criminal penalty in a food safety case. The agreement further required Family Dollar and Dollar Tree to meet robust corporate compliance and reporting obligations for the next three years.

Environmental Justice Training and Resource Development

The Office of Environmental Justice (OEJ) continues to build environmental justice literacy throughout the Department. Below are some of the engagements in which Department attorneys and professional staff have participated in FY 2024:

- ✦ Staff from OEJ and the [Environmental Enforcement Section](#) shared best practices for community outreach with staff from numerous State Attorneys General’s offices.
- ✦ Attorneys and professional staff in the [Environmental Crimes Section](#) (ECS) attended a training on EPA’s EJScreen, an EJ mapping and screening tool that combines environmental and demographic indicators in maps and reports.
- ✦ ECS hosted an Environmental Crimes Seminar with EJ-focused sessions for criminal assistant U.S. attorneys and environmental justice coordinators with DOJ’s National Advocacy Center.
- ✦ OEJ, Civil Rights Division, [CRS](#), two [USAOs](#), and ENRD’s Assistant Attorney General participated in plenary and panel sessions at the 2024 National Environmental Justice Conference and Training Program.



DOJ staff and contractors at the 2024 NEJC. Photo credit: Michael Vacca, USDOJ



CRS panel members at the 2024 NEJC. Photo credit: Michael Vacca, USDOJ

- ✚ For the second year in a row, OEJ provided EJ training to the incoming ENRD Attorney General's Honors Program graduates. This year's training featured an innovative environmental justice simulation, which was designed to build awareness and help the new attorneys deepen their understanding of the challenges facing overburdened and underserved communities.



ENRD Honor Grads participate in a simulation at the 2024 EJ Training. Photo credit: OEJ staff

- ✚ Lastly, OEJ and the Executive Office for U.S. Attorneys continued with monthly training for the civil or criminal prosecutors appointed to serve as the environmental justice coordinator for each U.S. Attorneys' Office. FY 2024 topics included [Lead Paint Enforcement Efforts](#), a [Civil Division](#) presentation, *Incorporating EJ into a [Task Force](#), Environmental Justice & [Tribal Sovereignty](#)*, and EJ case highlights from assistant U.S. attorneys around the country.

In addition, EJ resource materials were developed to facilitate implementation of the Strategy. Specifically, significant updates and additions were included on such topics as lead paint and Tribal trespass.

PRINCIPLE 3: Ensure meaningful engagement with impacted communities.

Consistent with principle three of the Strategy, the Department increased its efforts to identify areas of concern to overburdened and underserved communities. Department personnel organized listening sessions to provide opportunities for community members to express their views on government decisions that affect them. DOJ held outreach events to familiarize communities with federal environmental laws, the enforcement process, and the roles of federal, state, Tribal, and local government agencies. In addition, the Department communicated avenues to share concerns about polluting activities or suspected violations of law and discussed available remedies to address environmental harms.

Outreach and Listening Sessions

In FY 2024, [USAOs](#) and other components, with the support of OEJ and agency partners, conducted general outreach to communities including participating in local, regional, or national listening sessions regarding environmental justice concerns. Several engagements are highlighted below:

- ✚ **OEJ partnered with the Office of Tribal Justice** to hold [in-person and virtual Tribal consultations](#) on the Department's draft Tribal Environmental Justice Policy. The Offices also accepted written comments from Tribes on DOJ's environmental justice work in Tribal communities broadly, as well as on the draft Tribal EJ Policy.

- ✚ **OEJ** also held listening sessions on the Department's draft [EJ Strategic Plan](#) to obtain and incorporate public feedback on the Plan. It also provided an opportunity to share more about DOJ with communities faced with long-standing EJ concerns or affected by emerging issues.



An OEJ attorney advisor speaks with community members at DOJ's Environmental Justice Strategic Plan outreach event in New Orleans, Louisiana. Photo credit: OEJ staff

- ✚ **Eastern District of Washington USAO** co-hosted an Environmental Justice Conference celebrating the fifty-year anniversary of Expo '74, when Spokane, Washington was the site of the first environmentally themed world's fair. The U.S. Attorney for the District, Vanessa Waldref, organized the conference. It involved collaboration with and speakers from the Gonzaga University Climate Institute, the Washington State Attorney General's Office, and EPA. The conference looked retrospectively at the EJ work completed over the past half century and the remaining work to be done in the coming decades. Panelists from government, environmental non-profit organizations, and the Spokane Tribe examined efforts to protect the Spokane River and considered priority areas for environmental enforcement.

U.S. Attorney Waldref provided remarks announcing the formation of [Eastern Washington’s first environmental task force](#) and the District’s series of environmental listening sessions and other outreach events directed toward engaging communities disproportionately burdened by pollution and climate change.

- ✚ **Northern District of West Virginia USAO** presented on EJ and DOJ’s EJ initiatives at a civil rights event sponsored by their office and at the West Virginia Human Rights Commission’s Fair Housing Conference in April 2024.
- ✚ **Southern District of Indiana USAO** conducted a public outreach session with the NAACP, Hoosier Environmental Council, and other advocacy groups regarding environmental enforcement.
- ✚ **North Dakota USAO** shared EJ materials with attendees at a local community college job fair.
- ✚ **South Carolina USAO’s** EJ Coordinator participated in two “EJ Hub” events hosted by the state environmental health department.
- ✚ **New Mexico USAO’s** EJ webpage was translated to Spanish, Diné, and Vietnamese to provide language access to local communities.

Case-specific Community Outreach Plans

Department attorneys and professional staff also developed and implemented case-specific outreach plans as part of DOJ’s efforts to ensure communities are informed about and engaged with the enforcement process. In collaboration with other agencies and accounting for language-access needs, cultural practices, and other important aspects of a community, Department attorneys worked to produce effective community outreach events in tandem with their cases. A selection of FY 2024 case-specific engagements is discussed in this section.

- ✚ **Texas** – The Environmental Crimes Section (ECS) continued to develop best practices and procedures to communicate with victims and communities impacted or potentially impacted by large-scale explosions and chemical releases. In both *United States v. Aghorn Operating Inc., et al.* (Western District of Texas) and *United States v. TPC Group LLC* (Eastern District of Texas), ECS successfully navigated complying with confidentiality obligations and professional responsibility rules limiting pre-trial public statements by prosecutors to effectively disseminate public notices and maintain comprehensive public websites with case information. ECS continues to refine the processes developed in these cases as models for new cases.
- ✚ **Montana** – ENRD is engaging with Tribal leadership in Montana to address critical public health and environmental concerns facing a reservation. Since the engagement efforts began, the Tribal legislature passed a comprehensive public utilities code that addresses drinking water, wastewater, and solid waste. ENRD is actively working with the public utilities board members to address outstanding violations and to implement measures with a focus on long-term compliance. To keep Tribal community members apprised, EPA released an information sheet describing the public health and environmental concerns and the progress being made to address those concerns.
- ✚ **Illinois** – ENRD attorneys are engaged with residents and a community group on a matter that aims to address Clean Water Act violations. Since work began on this matter, the case team met with residents in their homes and attended several virtual meetings. In December 2023, the case team attended an in-person meeting with the local community group to present the draft consent decree and to provide residents with the opportunity to ask questions. Attorneys met with the group again in person in February 2024, to hear additional feedback on the proposed consent decree.

As a part of these meetings, the team provided residents with copies of a comprehensive PowerPoint presentation and information about the public comment process. In July 2024, the team shared a copy of the draft decree with the group and will consider their comments before lodging the consent decree for the formal public comment period, which the team plans to extend to 60 days (instead of the customary 30 days). Additionally, plans are being developed to hold an open house in the community during the comment period.

- ✚ **Texas** – After the consent decree was lodged in [*Texas Petrochemical Company \(TPC\) Group LLC*](#), and prior to filing a motion to enter the Decree, DOJ held a virtual community meeting in June 2024 that was attended by approximately 55 people. Prior to that, in January 2023, DOJ and EPA met with approximately 60 community members in Houston to receive their input. The Department also considered the more than 100 comments received during the public comment period before filing its motion to enter the consent decree.
- ✚ **Mississippi** – EPA and DOJ held public meetings in October 2024 to get community input on future solutions to improve Jackson’s drinking water system. EPA and DOJ previously heard from the public through meetings, letters, emails, and phone calls. In the recent meetings, EPA and DOJ were seeking additional community feedback to assist with continued oversight of the drinking water system.
- ✚ **Colorado** – ENRD drafted a comprehensive community engagement plan, which includes distributing an information sheet on the litigation process and holding small group meetings with community leaders, for a forthcoming Clean Water Act enforcement action.

Community Relations Service Coordination

Another way the Department increased its efforts to identify areas of concern to overburdened and underserved communities is through increased coordination with its Community Relations Service (CRS). CRS is not an investigatory or prosecutorial DOJ component and therefore does not have any law enforcement authority. Instead, it serves as a peacemaker for communities facing conflicts related to alleged discriminatory practices based on race, color, national origin, gender, gender identity, sexual orientation, religion, or disability. CRS functions as a neutral party and works with all sides to craft solutions to conflict through facilitated dialogue, mediation, training, and consultation.

Discussed below are two communities CRS, in coordination with other DOJ components, aided with participation in environmental decision-making that may affect them.

- ✚ **Navajo Nation – Arizona.** CRS received a request for assistance from ENRD to improve lines of communication with Navajo Nation tribal leadership and community members following reports of uranium contamination concerns in the community. CRS was asked to help identify issues and develop priorities in addressing environmental concerns. CRS met with representatives of ENRD to offer best practices on how to initiate outreach efforts with tribal leadership.
- ✚ **EJ Listening Sessions on Air Quality – California.** In April 2024, CRS regional staff facilitated two virtual EJ listening sessions focused on air quality for EJ community leaders within Los Angeles, Orange, Riverside, San Bernardino, Ventura, Santa Barbara, and San Luis Obispo counties. Spanish interpretation was provided. During these events, the EJ Coordinator from the USAO for the Central District of California shared relevant jurisdictional information with the community leaders regarding air quality in their respective areas.

CRS regional staff provided attendees with a spreadsheet listing EJ-relevant government contacts and resources within Central California at the city, county, and state levels to support any needed follow up.

The Department also heard from community leaders on the EJ issues facing their residents. Later in the year, the same USAO convened regulators across the state to share the community's feedback. Regulators discussed ways to encourage change within their agencies including by implementing more effective collaboration across departments to ensure issues are appropriately addressed and by continuing to meet on a regular basis to share progress.

PRINCIPLE 4: Promote transparency regarding our environmental justice enforcement efforts and results.

The fourth principle of the Strategy affirms the importance of establishing a culture of transparency in the Department's environmental justice work. It is imperative that communities with environmental justice concerns can readily access information about filed and concluded enforcement actions and the benefits achieved as a result of the Department's actions. Communities should also be able to easily access the Department's EJ-relevant accomplishments resulting from the Strategy.

DOJ previously identified metrics to advance environmental justice for the USAOs, CRS, the Civil Rights Division, and ENRD under an agency-wide [FYs 2022-2026 Strategic Plan](#). During [year one of the Strategy](#), OEJ included metrics from the FYs 2022-2026 Strategic Plan and developed measures based on information in the [2022 Strategy](#) in order to assess progress and gain a deeper understanding of the impact of the Department's work.

The Plan also outlines objectives and priority actions that the Department will pursue to advance each goal along with performance indicators to measure progress. It is an improved continuation of the Department's efforts to advance environmental justice and includes considerable aspects of the Strategy and previous DOJ environmental justice guidance documents. The aim is to ensure the Department has a sustained and transparent commitment to seeking equal justice under the law, reducing disproportionate adverse public health and environmental burdens, while holding itself accountable.

Expanding the Strategy

Moving forward, the Department will continue to promote transparency in its EJ enforcement efforts and results while honoring the elements of confidentiality warranted and its legal obligations under the newly drafted [Environmental Justice Strategic Plan \(Plan\)](#). The Plan is an agency-wide environmental justice strategy, which incorporates and supersedes the current Strategy as well as past DOJ EJ guidance documents. It sets forth a vision for advancing environmental justice and establishes goals that will guide the Department's EJ work in the future.