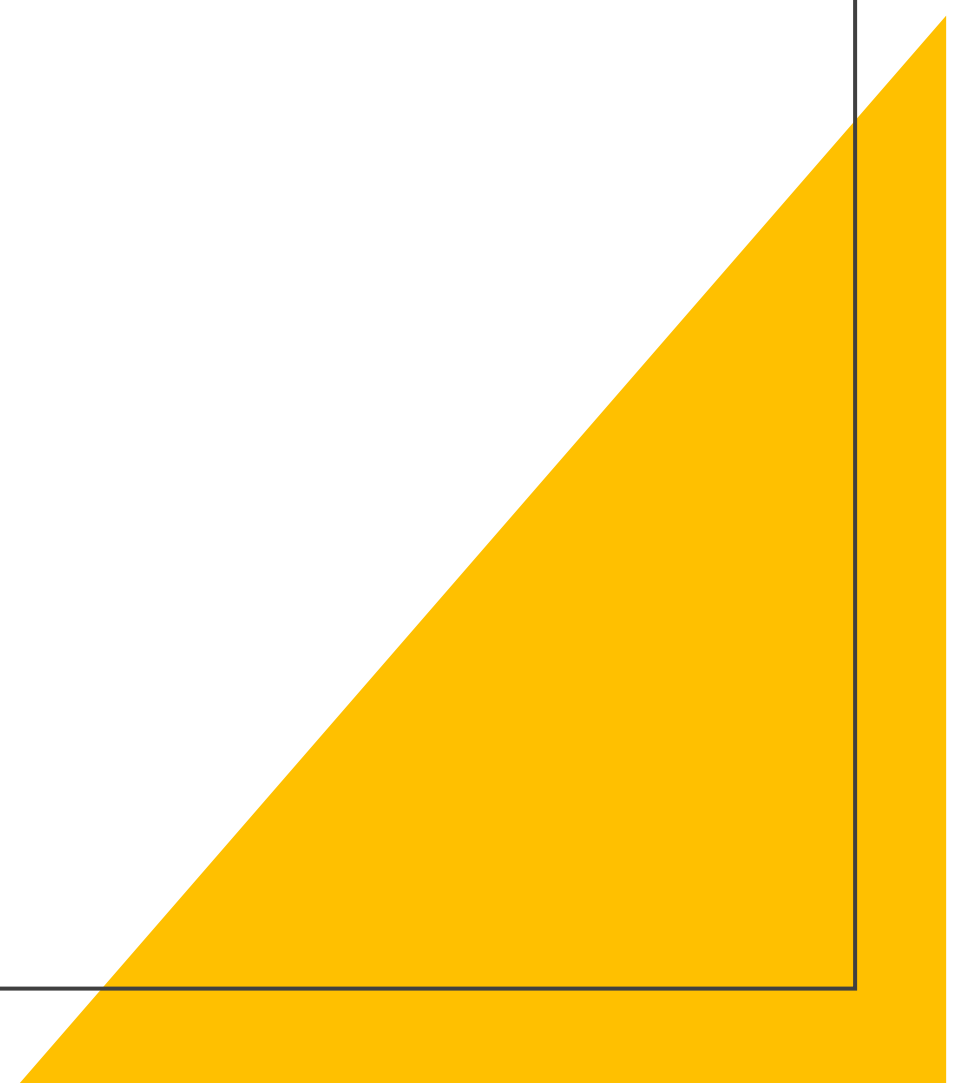# Advancing Equity in the CWA §319 Program

Ellie Flaherty, US EPA
2024 National Training Workshop On
Water Quality Assessment And Plans

Overview: Supporting and Improving Equity in the NPS Program

- **Assessing and improving equity and inclusion is a national priority for the NPS program**

  - 2021 memo: [Near-term Actions to Support Environmental Justice in the NPS Program](#)
    - National commitment and call for state programs to take actions to enhance environmental equity
    - 12 state listening sessions and 2 Tribal consultations - identify current work and challenges
    - 4 grantee workgroups – **including equity analysis workgroup**

  - 2022 memo: [Continued Actions in FY23 to Increase Equity and Environmental Justice in the NPS Program](#)
    - Strong state program efforts to improve equity (i.e., match waivers, application criteria)
    - Increased program flexibilities and expected actions (i.e., watershed planning flexibilities and reporting expectations)
    - Actions to better support Tribal program (i.e., increase to Tribal set-aside, increased competitive funds, state funding flexibilities)
    - Continued support (i.e., technical assistance, **equity analysis**, engagement)

RPS Equity Analysis: Pilot Project Objectives

- Develop accessible method of assessing where NPS pollution issues and program priorities exist in relation to communities with EJ concerns.

- Provide an NPS-focused method for state programs to assess, track, and/or prioritize NPS program investments.

Project Teams

- Project Team Composition: EPA NPS Program staff, EPA Regional staff, state water quality program staff (NPS, TMDL, etc.), Cadmus Group (technical support)

- Pilot states: KY, CA, WV, WA, and NV

RPS Pilot Project Process

- Step 1 – Define the Screening Objective

- Step 2 – Select Watersheds and Indicators

- Step 3 – Run Screening and Review Results

- Step 4 – Select Optimal Screening(s)

Project Highlights

- Custom RPS template for multiple state NPS programs

- Multiple state-specific RPS indicators

- Interactive visualization tool

- Development of historically redlined areas dataset

- Final project report: Overview of pilot projects, recommendations, and instructions on inverting WSIO indicators

Kentucky RPS Indicators for NPS/Equity Analysis

- *Ecological*

- PHWA Watershed Index (standalone) or
Custom: % N-Index, % Wetlands, % Woody Vegetation in Riparian Zone, Aquatic Condition Score, Presence of Critical Habitat for Aquatic Species, Headwater HUC12 Flag, % Draining to 1st, 2nd, or 3rd order streams, Unimpaired Waters

- *Stressor – NPS*

- Nitrogen Yield, Phosphorus Yield, Suspended Solid Yield, Impaired Waters %, Impairment Count, Impairment Cause Count, Nutrient Impaired Waters %, Sediment Impaired Waters %, Pathogen Impaired Waters %
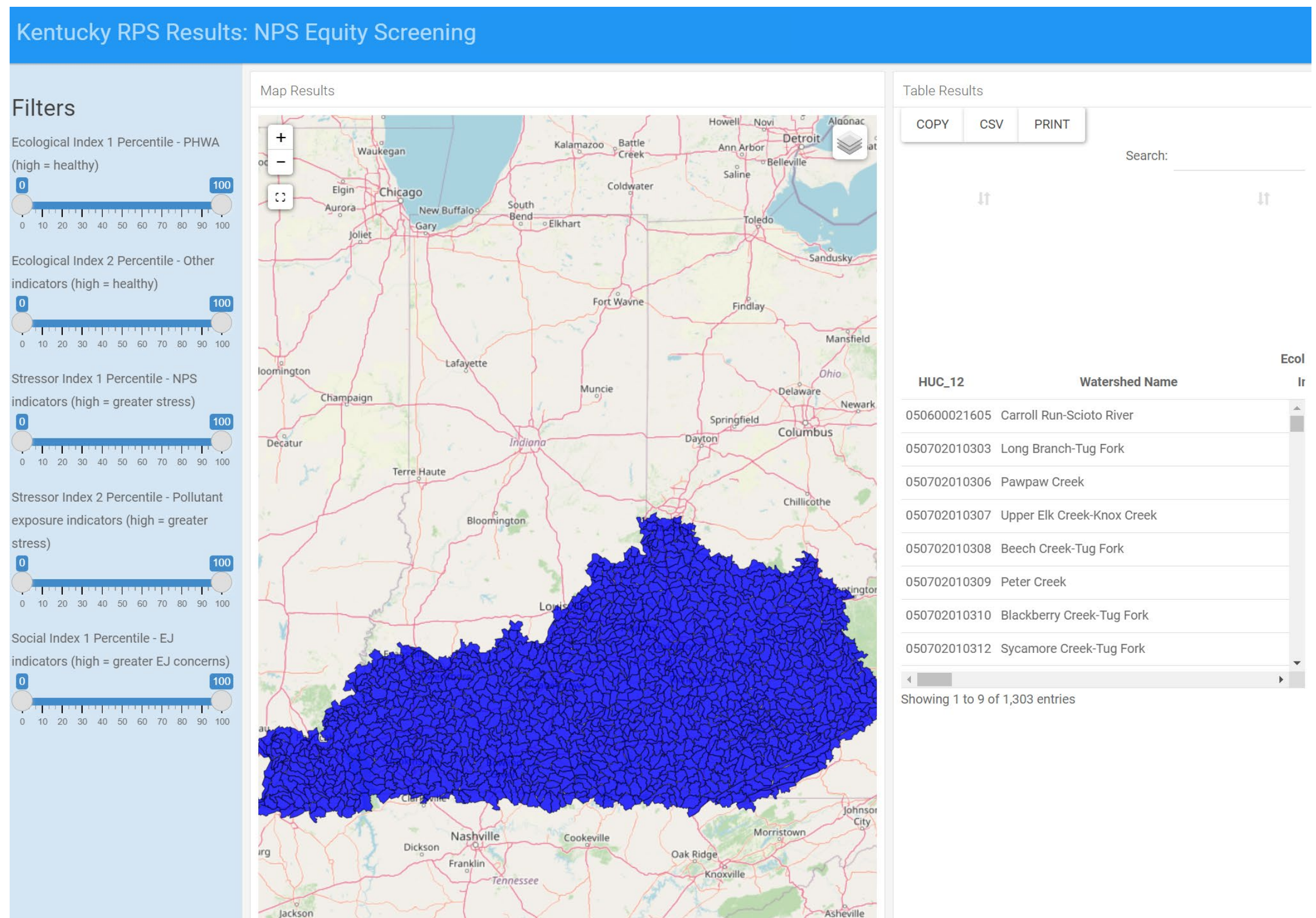
- *Stressor – Pollutant Exposure*

- Risk Management Plan Site Count, Hazardous Waste Management Site Count, Toxic Release Inventory Site Count, Superfund Site Count, Impervious Surface Cover, **Permitted Mines (state-specific indicator)**
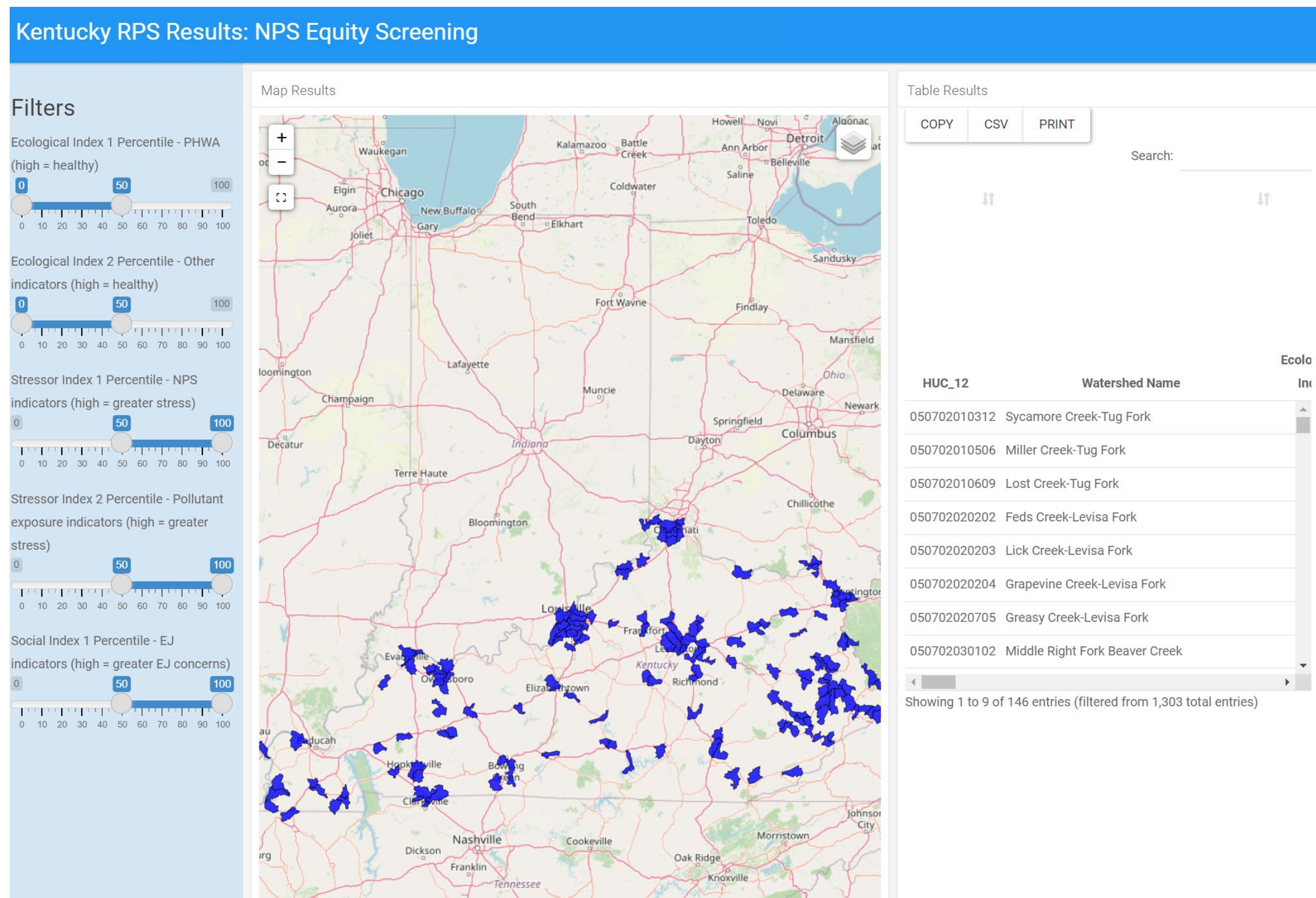
- *Social*

- % Low Income Population, % Less Than High School Educated Population, % Linguistically Isolated Population, % Vulnerable Age Group Population, Inverse NPS Pollution Control Project Count, Unassessed Waters %, **Historically Redlined Communities**

Interactive Data Visualization of RPS Screening Results

Interactive Data Visualization of RPS Screening Results

Conclusions and Next Steps

Interim outcomes:

- RPS can support joint assessment of water quality and socioeconomic/ demographic data

- This method provides an NPS-specific assessment of program priorities and investments

- Project report/best practices guide: https://www.epa.gov/nps/equity-resources

Next steps:

- Future support for additional state programs