



DEPARTMENT OF THE ARMY  
U.S. ARMY CORPS OF ENGINEERS  
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WASHINGTON, DC 20314-1000

DEC 16 2022

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MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Implementation of the Interim Environmental Justice Strategic Plan

1. Reference is made to the Assistant Secretary of the Army for Civil Works (ASA(CW)) Memorandum for Commanding General, U.S. Army Corps of Engineers (USACE), Subject: Implementation of Environmental Justice and the Justice40 Initiative, 15 March 2022.
2. The purpose of this memorandum is to transmit the USACE Interim Environmental Justice Strategic Plan for immediate implementation across the Civil Works enterprise. Additionally, this memorandum provides requirements for the development of district strategic plans.
3. On 15 March 2022, the ASA(CW) issued interim guidance for USACE Civil Works programs for the implementation of environmental justice and the Justice40 Initiative. The interim guidance defined Environmental Justice and instructed USACE to take a proactive and comprehensive approach as follows: "Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income regarding the development, implementation, and enforcement of environmental laws, regulations, and policies, with no group bearing a disproportionate burden of environmental harms and risks. Environmental justice and disproportionate impacts to disadvantaged communities shall be considered throughout the Civil Works programs and in all phases of project planning and decision-making, consistent with the goals and objectives of various Administration policies."
4. The interim guidance directed USACE to focus generally in three broad areas: 1) improving outreach and access to USACE Civil Works information and resources; 2) improving access to USACE Civil Works technical service programs (e.g., Planning Assistance to States and Floodplain Management Services programs) and maximizing the reach of Civil Works projects to benefit disadvantaged communities, in particular as it relates to climate resiliency; and, 3) ensuring any updates to USACE Civil Works policies and guidance will not result in a disproportionate impact on disadvantaged communities. The interim guidance also identified priority action areas to be addressed, which include the Tribal Partnership Program, Planning Assistance to States, and Floodplain Management Services, as well as more broadly to the study, design, construction, and operation phases of projects primarily for flood risk management, coastal storm risk management, and aquatic ecosystem restoration.

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5. To meet the charge of the ASA(CW) interim guidance, USACE Headquarters has developed a Strategic Plan that establishes a framework for achieving Environmental Justice in all phases of USACE Civil Works programs. The Strategic Plan establishes seven critical objectives to guide the successful implementation of Environmental Justice policy. Execution of these objectives will increase the timeliness and quality of outreach while we continue to build strong and meaningful relationships with Tribal Nations and disadvantaged and underserved communities. We will focus on delivering whole-of-government solutions, understanding that not just one agency or level of government can always be the solution to the problems that a community is experiencing. We will also continually assess and enhance our workforce, building the capabilities and resources to overcome barriers and address equity issues where needed.

6. In accomplishing the objectives in the Strategic Plan, USACE must establish and maintain both a strong regional and national foundation. The following requirements will ensure that USACE develops the proper alignment and capacity of our workforce, which when combined with maximum leadership engagement, will produce a sustainable structure and focus on achieving Environmental Justice.

a. District Strategic Plans. Each district will enhance its Environmental Justice Strategic Plan with an outreach strategy that is specifically targeted to its area of responsibility (AOR). District Commanders will approve Strategic Plans and submit them to the MSC no later than 3 March 2023 for endorsement by the Division Commander within 30 days. District Strategic Plans will be a living document and will be updated appropriately as new information becomes available and as new regulations, policy, and guidance are released. District Strategic Plans must be approved and endorsed every three years to ensure robustness and relevancy. The Collaboration and Public Participation Center of Expertise (CPCX) is currently developing a guide for District Strategic Plans that will be released in January 2023. District Strategic Plans will address the following factors:

- 1) Build Internal and External Capacity;
- 2) Structure the Office for Success;
- 3) Assess Current Relationships and Capabilities; and,
- 4) Prepare and Conduct Inclusive Outreach and Engagement Approaches.

b. District Environmental Justice Coordinator. By 15 January 2023, each district office will identify a District Coordinator for Environmental Justice that will be responsible for vertical coordination with the Division and USACE Headquarters. Notification will be provided to the MSC Planning Chief

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and HQUSACE Environmental Justice Program Manager. District Coordinators will update the district strategic plan as necessary and work to ensure application of Environmental Justice considerations across District mission areas.

c. Regional Environmental Justice Coordinator. By 15 January 2023, each MSC will identify an Environmental Justice Regional Coordinator that will provide oversight for the integration of environmental justice in programs and activities across the AOR. Regional Coordinators will be responsible for ensuring a balanced and coordinated approach with other federal agencies to improve the flow of relevant information to disadvantaged and underserved communities. Regional Coordinators will coordinate with District Coordinators to determine and provide training and resource needs across the AOR. The Regional Coordinator will ensure that the HQUSACE Program Manager remains informed at an appropriate level of developing issues, district needs, and overall oversight details for the implementation of Environmental Justice.

d. HQUSACE Environmental Justice Program Manager. The HQUSACE Environmental Justice Program Manager will establish and maintain frequent communication with Regional and District Integrators. The Program Manager will coordinate enterprise training needs with the Planning Community of Practice and will collaborate with IWR and the CPCX for the development of additional tools or products to increase the strength of USACE Environmental Justice knowledge and implementation abilities. The Program Manager will periodically review District Strategic plans and provide recommendations to increase effectiveness as necessary. The Program Manager will also coordinate with the Senior Tribal Liaison on a regular basis to ensure the consistent application of Environmental Justice between Tribal Nations and underserved and disadvantaged communities.

7. Districts will coordinate with their MSC Planning Chief to identify funding sources for the further development of strategic plans.

8. Questions regarding this memorandum should be directed to Ray Wimbrough, Senior Policy Advisor, HQUSACE Planning and Policy Division, at 202-761-4056 or raymond.l.wimbrough@usace.army.mil.



WILLIAM H. GRAHAM, JR.  
Major General, USA  
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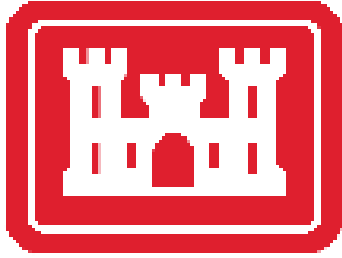
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U.S. Army Corps of Engineers  
Interim Environmental Justice Strategic  
Plan: Community Outreach &  
Engagement

19 December 2022

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## Introduction and Background

The mission of the U.S. Army Corps of Engineers (USACE) is to deliver vital engineering solutions in collaboration with our partners, to secure our Nation, energize our economy, and reduce disaster risk. In performing this mission, USACE implements a substantial Civil Works program with projects aimed at developing and maintaining our Nation's federal waterways and ports, restoring aquatic ecosystems, and managing risks from inland flooding as well as coastal hurricane and storm events.

Implementation of the Civil Works program requires USACE to conduct complex technical analyses and extensive public engagement for diverse communities across the Nation. USACE conducts numerous studies under both specific authorities (Investigations) and continuing authorities (Continuing Authorities Programs (CAP)) to determine whether there is federal interest in planning, designing, constructing, and managing projects for these various mission areas. Additionally, various programmatic authorities, such as Planning Assistance to States (PAS), Floodplain Management Services (FPMS), Tribal Partnership Program (TPP), and multiple environmental infrastructure authorities, are critical to meeting the needs of communities across the Nation by providing technical assistance, planning services, and smaller project planning, design, and implementation. Post-study phases that include engineering and design, construction, and operations and maintenance of projects, require USACE to continually assess the effects of its actions on the public and respond as needed.

In March 2022, the Assistant Secretary of the Army (Civil Works) (ASA(CW)) established an expansive environmental justice policy in the memorandum titled "Implementation of Environmental Justice and the Justice40 Initiative." The ASA(CW) memorandum directs USACE to develop an outreach strategy that "should capitalize on a broad range of community meetings and other organized community-level opportunities and engage communities to truly listen to their needs. We (USACE) should strive to align our missions and authorities with their vision of the future to address their needs and enable community resilience to the extent practicable."

The ASA(CW) memorandum calls for a fundamental change in the outreach to and engagement of communities at all levels and across the entire USACE Civil Works organization, listening to USACE partners and stakeholders to understand their needs and problems, identifying opportunities to partner to address those challenges – which may or may not be a USACE project/program, and a commitment to identify and remove barriers to partnership with communities.

In this Interim Environmental Justice Strategic Plan: Community Outreach and Engagement Strategic Plan, USACE outlines its vision to meet the charge of the ASA(CW)'s memorandum by focusing on the following objectives:

- 1) *Improving the timing and quality of outreach* to local communities and access to USACE Civil Works information and resources;
- 2) *Forming strong partnerships* within and outside of the government to strengthen underserved and disadvantaged community participation in USACE programs and activities;
- 3) *Developing and optimizing USACE resources* to broaden internal expertise through the continual refinement and application of tools, training, and products centered on environmental justice;

- 4) *Strengthening Tribal relationships* by taking advantage of opportunities to listen and increase effective communication while enhancing USACE’s ability to understand and respond to Tribal water resources needs;
- 5) *Improving awareness, access, and participation for USACE Civil Works technical assistance programs* while maximizing assistance that benefits underserved and disadvantaged communities;
- 6) *Forming effective partnerships, early engagement, and ensuring comprehensive analysis* of a full range of benefits for USACE studies and programs; and,
- 7) *Developing whole-of-government solutions\**, where possible, for all aspects and phases of USACE Civil Works programs, from study development to construction and operation of projects.

*\*A whole-of-government approach involves collaboration and coordination across horizontal (USACE/Federal Emergency Management Agency (FEMA)/Environmental Protection Agency (EPA), etc.) and vertical (federal/state/local) agency boundaries.*

*In establishing the environmental justice policy for USACE, the ASA(CW) memorandum defines environmental justice as the “fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income regarding the development, implementation and enforcement of environmental laws, regulations, and policies, with no group bearing a disproportionate burden of environmental harms and risks.”*

Applicability: This Strategic Plan is applicable to all USACE Civil Works programs and activities, with specific relevancy noted in the text. The Regulatory program, however, is not included.

## Objective 1: Improving the Timing and Quality of Outreach to Local Communities and Access to USACE Civil Works Information and Resources

Before communities and Tribal Nations can access USACE programs and services, they first need to be aware of the opportunities available to them. This requires an energized outreach strategy that is developed and executed in collaboration with partners from the local community all the way up to the national level.

Appropriately based at the most local level of USACE, district-based outreach strategies, tools, and methods must be based on an understanding of the communities informed by listening to their needs and interests. This strategy capitalizes on existing relationships and programs, can be utilized by districts and divisions across the nation, and provides a roadmap for engagement with new and existing external partners and resources.



*Organize and Focus: District-based environmental justice and outreach strategies must be built on a strong regional and national foundation*

**Districts:** Each district will enhance its Environmental Justice Strategic Plan with an outreach strategy that is specifically targeted to its area of responsibility. Each district will also designate and maintain a single point of contact (District Environmental Justice Coordinator) that will be responsible for managing its Environmental Justice Strategic Plan and vertical coordination with the division and USACE Headquarters.

Targeted district outreach efforts will be established with coordinated approaches for reaching out to communities of interest, establishing relationships with identified community points of contact, and learning about community needs and priorities. This approach may include webinar events, in-person events (i.e., tableside discussions, road shows, or site visits), and other mechanisms identified by other partners.

As districts vary in size, organization, and regional priorities, there are circumstances where district staff availability to conduct outreach is limited. When possible, technical assistance program staff will be supported by USACE specialists and disciplines versed in communications and engagement within that district or division, such as public involvement specialists. Each district's outreach strategy will investigate where these additional resources are needed to perform effective outreach and will draw upon public information specialists and the national USACE Collaboration and Public Participation Center of Expertise (CPCX) for support. It is critical that staff that conduct outreach are well versed on USACE programs to effectively match assistance with the potential partner's needs.

**Divisions:** Each division will provide oversight for district integration of environmental justice in their programs and activities and will serve as a regional integrator of each district's individual strategic plan. Coordination across districts will be led by the Regional Environmental Justice Coordinator and outreach resources will be shared and tailored to local needs. Training will be made available to district staff conducting outreach activities with a centralized location for informational resources.

**USACE Headquarters.** USACE Headquarters will identify a dedicated Environmental Justice Program Manager who will report progress and key issues to leadership for resolution/action. The Program Manager will be responsible for maintaining communication with division and district points of contact. Additionally, the Program Manager will establish and maintain relationships with environmental justice program leads from other federal agencies to facilitate information exchange and investigate opportunities for mutual advancement of policy goals. Finally, the Program Manager will maintain close coordination with the Environmental Justice Lead at ASA(CW) and will ensure all relevant USACE Headquarters staff, to include Planning Division and other offices, are informed and included in necessary communications regarding environmental justice.

**USACE Leadership.** USACE Leadership at the district, division, and Headquarters levels will ensure that outreach to communities and meeting the ASA(CW) memorandum receives prioritization, within each mission area and within each element of the Civil Works project development process to include planning, design, construction, and operations and maintenance.

## Objective 2: Forming Strong Partnerships within and outside of the government to strengthen underserved and disadvantaged community participation in USACE programs and activities

Improving access to USACE information and resources and ultimately improving access and participation in USACE programs and activities begins with an emphasis on both existing and new relationships.

USACE works with numerous partners at all levels of government and outside government. The depth and value of the engagement with these partners generally varies between programs, mission areas, and districts. For example, a local government partner may engage directly with USACE on a project-specific basis with a focus on a particular set of problems over the course of months or years. For communities that have little experience with USACE or understanding of its mission, the relationship may begin through a word-of-mouth introduction from a neighboring community or through a partnership meeting, conference, or event.

Through interagency, state-led Silver Jackets teams, USACE has cultivated existing relationships with agency representatives in each state, the District of Columbia, and several U.S. territories. These relationships are often with state National Flood Insurance Program Coordinators and/or State Hazard Mitigation Officers, state environmental protection specialists, and other state and federal agency representatives. These teams provide not only state-level access to the understanding of community needs, but a ready-made partnership and understanding about the missions and programs of multiple agencies.

Common understanding and frequent communication across the federal agencies engaging with disadvantaged and underserved communities will help ensure more efficient and effective support and assistance can be provided, since not all disadvantaged or underserved communities will have needs that can be met by any one specific agency while partnerships and support from multiple agencies can create a more comprehensive and durable solution to local challenges.

Interagency Silver Jackets team partnerships will also be leveraged to coordinate outreach efforts with state and federal partners to more efficiently reach communities with relevant information without overwhelming community partners. Given the limited resources (both financial and personnel) available within disadvantaged communities, efficiencies, and coordination in outreach efforts, both within USACE and with other partners, should help enable more successful provisions of assistance to disadvantaged and underserved communities.

Additionally, as previously indicated, the USACE Headquarters Environmental Justice Program Manager will establish and maintain relationships with environmental justice program leads from other federal agencies. These relationships will be critical to maintaining oversight of USACE programs and policies

### **USACE Partners to Support Outreach Efforts**

- State government officials
- Local government officials
- Regional government officials
- Tribal government officials
- Territorial government officials
- Federal agencies (e.g., FEMA, EPA, National Oceanic and Atmospheric Association, Council on Environmental Quality)
- Nongovernmental organizations (e.g., Association of State Floodplain Managers, National Association of Flood and Stormwater Managers, American Rivers, The Nature Conservancy, American Flood Coalition)

and ensuring there are no conflicts across federal agencies in regard to communication and collaboration with disadvantaged and underserved communities.

### Objective 3: Developing and optimizing USACE resources to broaden internal expertise through the continual refinement and application of tools, training, and products centered on environmental justice

USACE's resources, programs, and expertise will continue to be deployed toward community engagement and environmental justice with a recurrently refined focus.

The CPCX builds the agency's collaboration and outreach capabilities and coordinates related efforts across the enterprise. The CPCX is a key resource in supporting the development and execution of district-based outreach and engagement plans and is the center of an extended network that includes liaisons at each division, public involvement specialists at most districts, and the agency-wide Collaboration and Public Participation (CPP) Community of Practice (CoP). The CPCX develops and shares technical tools, techniques, policies, resources, and training on collaboration, outreach, teaming, and partnering.

Districts will leverage the CPCX and other internal expertise to develop and execute their outreach strategies. Other internal USACE resources include:

- District and division PAS, FPMS, and Silver Jackets program coordinators;
- Outreach coordinators (not in every district);
- District and division-based planners, archaeologists, sociologists, social scientists, and economists in the Planning CoP;
- District and division Tribal liaisons, the Tribal Nations Technical Center of Expertise, and the Tribal Nations CoP;
- Emergency Management CoP and district Emergency Management programs' local government liaisons; and,
- Public Affairs Office CoP and the Public Affairs officers at districts, divisions, and USACE Headquarters.

USACE will continue to develop and update its internal resources for staff utilization, including tools, training, and reports/guidance, including the introduction of a Social Science portal on the Planning Community Toolbox. Additionally, USACE will also further develop its external websites at the district, division, and Headquarters levels to ensure both accessibility and usability for all communities. These resources will not only provide information about USACE programs that are available but, when possible, will provide information about non-USACE agencies, services, or resources that can be accessed for assistance. Most importantly, these tools must provide updated information for USACE points of contact that can assist local communities with water resources problems or other issues as encountered.

## Objective 4: Strengthening Nation-to-Nation relationships by taking advantage of opportunities to listen and increase robust communication while enhancing the USACE ability to understand and respond to Tribal water resources needs

Many USACE districts have regular engagements with the Tribal Nations in their area of responsibility. These regular engagements have provided opportunities to develop relationships with Tribal leaders and staff to gain a better understanding of Tribal water resources needs. The district Tribal liaisons participate in government-to-government consultations, where many Tribal needs are discussed and are not exclusively limited to water resources projects. During these key engagements, USACE staff listen and consider if any of these needs can be matched with various USACE programs, including TPP, FPMS, PAS, CAP, or even Interagency and International Services.

Several factors are considered when aligning USACE authorities with a Tribal Nation's needs. A discussion on the scope of the problem, impacts to Tribal Nation resources, types of analyses or products required, and availability of funds for the Tribal Nation to partner are all helpful as one program may be more beneficial than the others to meet the current needs. If possible, USACE will also assist Tribal Nations with initial contact and access to other resources, such as other federal agencies or state/local programs, if they may be of potential assistance.

Four current avenues for Tribal engagement will be strengthened and continued:

- Many districts and District Commanders have regular meetings with Tribal Nations in their area of responsibility. Key personnel and district leadership need to be aware and ready to discuss all USACE programs, including TPP, to Tribal Nations when the opportunity is available.
- District Tribal liaisons conduct targeted outreach and coordination with Tribal Nations to learn more about their water resources needs, discuss the USACE processes required to get a water resources study including cost share requirements, and learn about the Tribal Nation's internal processes required for a water resources project.
- USACE district and division staff regularly attend regional Tribal Nation meetings and conferences when funding is available. These meetings are excellent opportunities to engage with multiple Tribal Nations at a single venue.
- USACE attends the National Congress of American Indians Mid-Year and Annual Conferences. USACE headquarters staff and local district staff conduct outreach to Tribal Nations on USACE programs that can assist their water resources needs, including TPP.

In addition, the ongoing development of comprehensive guidance for TPP will greatly enhance districts' abilities to share program information and partnering opportunities.

## Objective 5: Improving awareness, access, and participation for USACE Civil Works technical assistance programs while maximizing assistance that benefits underserved and disadvantaged communities

The district-based PAS and FPMS programs are critical to executing expanded outreach and engagement because of their existing relationships, experience in performing community outreach and engagement, and the availability of program funds to support outreach. The Program Managers for FPMS and PAS will produce a detailed engagement and outreach plan specific to each program that will provide a national, program-level framework for the efforts to improve communication and access for disadvantaged and underserved communities. The engagement and outreach plan will promote inclusivity and encourage participation by all communities as potential partners, and will provide a roadmap for how USACE personnel communicate to build internal capabilities, strengthen coordination across USACE, and work with key external partners to identify disadvantaged communities

As part of the engagement and outreach plan, USACE will focus on the needs of disadvantaged and underserved communities and explore ways to help them achieve their community goals. For those reasons, the engagement and outreach plan will identify activities that concentrate on internal coordination and communication as well as activities intended for external communications with USACE partners. The engagement and outreach plan will align with other ongoing communication efforts which include efforts by ASA(CW), USACE leadership, divisions, and districts.

To guide the development of the engagement and outreach plan, an analysis was conducted that identified barriers and challenges for effective outreach and engagement with disadvantaged and underserved communities. Innovative strategies will be formulated to guide district outreach and further establish and utilize tools and training. Lastly, the engagement and outreach plan will detail resource execution and how requests for assistance through PAS and FPMS will assist disadvantaged or underserved communities, support climate change adaptation and resilience needs, increase access to nature, or support repetitive flooding areas, all of which are priority areas that have been identified through the Administration and Congress.

## Objective 6: Forming effective partnerships, early engagement, and ensuring comprehensive analysis of a full range of benefits for USACE studies and programs

The ASA(CW) memorandum directs USACE to take a more proactive approach toward achieving environmental justice for studies. The memorandum directs a focus on a comprehensive evaluation of the total benefits of each plan, including equal consideration of applicable benefit types in the study scope of work where the disadvantaged and underserved communities play a key role in the effort to advance their needs.

In USACE Civil Works studies, specific efforts will be conducted to provide opportunities for effective public participation by Tribal Nations and minority, low-income, or other underserved communities in USACE planning and decision-making processes. USACE will conduct community engagement to provide

underserved and disadvantaged communities with pertinent study information and integrate their input into the planning and decision-making processes. Early engagement of disadvantaged and underserved communities, proper scoping of the study, and the partnership of USACE and the non-federal sponsor are each critical to achieving this directive. This section of the strategic plan is applicable to specifically-authorized Investigations studies, CAP, Dam Safety Modification Studies, and can also be applied to Disposition, Major Rehabilitation, or other Engineering studies and reports that may affect disadvantaged and underserved communities.

### Role of the Non-Federal Sponsor

The role of the non-federal sponsor as a project development partner is central to successful execution of the USACE Civil Works mission. This partnership is especially important when the study or project area includes underserved or disadvantaged communities. This relationship begins even before an agreement is negotiated and signed, so all parties understand the opportunities of USACE project planning and development authorities. The partnership is critical so that both USACE and the non-federal sponsor understand and consider the needs of the full community, and continually elevate those needs and interests. District leadership, to include Project Managers for individual Project Delivery Teams, must be fully aware of the focus on the needs of disadvantaged and underserved communities, and will prioritize messaging and collaboration from the initiation of USACE studies or projects.

### Engaging – Early and Often – the Whole Community in Project Development

Each study activity must meaningfully incorporate considerations of the whole community in the scope of the study, including outreach, engagement, and communication planning reflected in the Project Management Plan. Communication plans for each study will acknowledge and include detailed steps to meaningfully engage with disadvantaged and underserved communities. Items to be considered include:

- Development of accessible and inclusive public meetings and other engagements with the whole community;
- Equitable access for community and public involvement, which may necessitate multiple and different types of engagement within the study area (e.g., face-to-face meetings, virtual meetings, translated documents, multiple avenues for broadcasting information or taking comments); and
- Identifying potential environmental justice concerns and ensuring stakeholder engagement and considerations are in partnership with the non-federal sponsor.

### Comprehensive Benefits and Risk Informed Decision-Making.

In conducting studies, USACE will be proactive and ensure that disadvantaged and underserved communities play a central role in all phases of study development. Engagement with these communities will include the solicitation of input regarding potential community and sociocultural impacts, as well as other important factors that are identified during collaboration with partners and stakeholders.

Additionally, factors such as health and safety will continue to be assessed to ensure that disproportionate impacts to disadvantaged communities in the study area do not accrue as a result of potential projects. USACE will continue to expand analyses to ensure a complete accounting, consideration, and documentation of the total benefits of alternative plans across all benefit categories. Any trade-off analyses conducted to differentiate between plans must include an accounting of effects on disadvantaged communities to ensure that disparate effects are avoided.

## Plan Formulation and Alternatives Analysis: Setting the Groundwork for Decision-Makers

USACE's planning and project development process is an iterative process that generally is thought of as six main steps that, not coincidentally, correspond with the Principles, Requirements, and Guidelines for Water and Land Related Resources Implementation Studies and implementation requirements of the National Environmental Policy Act (NEPA) for federal project development. The considerations and input of the non-federal sponsor, project partners, and communities are key at every step of the way. For example, after initial identification of disadvantaged or underserved communities within the study area, outreach and coordination must occur to adequately include the considerations of the whole community in identifying the problems and opportunities, alternative development, and selection of the criteria that will be used to screen, evaluate, and compare alternatives.

Throughout the process, USACE teams must work to ensure that alternatives are not prematurely eliminated due to economic justification or other factors that do not fully consider the full range of benefits that may be produced by each alternative. In particular, the consideration and documentation of comprehensive economic, social, and environmental benefits to disadvantaged communities will advance the policy goals of the ASA(CW) memorandum.

Exceptions to the 3x3x3 policy (completion of feasibility studies within three years and \$3 million federal cost) may be needed for those studies that require substantial outreach and engagement with disadvantaged or underserved communities. Similarly, USACE study teams will consider requesting NEPA timeframe extensions to better facilitate meaningful and targeted engagement with disadvantaged communities.

## Objective 7: Developing whole-of-government solutions, where possible, for all aspects and phases of USACE Civil Works programs, from study development to construction and operation of projects

It is important to highlight that not every USACE study or action will result in a water resources project. USACE has very specific missions and cannot address every need that a disadvantaged or underserved community may encounter or experience. Given these circumstances, USACE can still perform critical functions, such as providing initial contact and access for an underserved community with a local, state, or federal agency that can provide assistance. Successful USACE outreach and coordination is about listening and providing awareness of potential assistance. USACE and other federal agencies possess a significant amount of experience and expertise in dealing with problems across the nation. This knowledge can be leveraged along with its partners to advise communities on the best path forward to alleviate problems that are being experienced.

Additionally, many times actions by others can be executed in parallel with those conducted by USACE to provide a comprehensive solution for communities. When possible, particularly for CAP or Investigations studies, USACE will recommend actions that can be taken by other entities such as localities, state governments, or other federal agencies to provide a comprehensive and whole-of-government solution to the water resources problems that are being encountered. For example, a USACE aquatic ecosystem restoration project could be executed in parallel with state water quality

assistance and local drainage improvements to provide a more comprehensive solution to water resources problems that are affecting an underserved community. Additionally, grant programs from other federal agencies and local community actions can be executed in parallel with a USACE project to provide a whole-of-government solution for flood risk management issues that are affecting communities. By working with its partners to provide a more comprehensive solution, USACE can contribute towards environmental justice by providing more resilient and sustainable projects that benefit disadvantaged and underserved communities.