

# **Agricultural Commissioner**

## **Equal Opportunity Plan**

**2022**



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## Section 1

### Department Head's Acknowledgment & Commitment to the 2021 Departmental Equal Opportunity Plan

The Monterey County Board of Supervisors adopted an ordinance reaffirming their long-standing commitment to the principles of providing equal opportunities for all and preventing and eliminating unlawful discrimination. The Board of Supervisors values providing an open and empathetic communication channel for County officials and employees, applicants for employment, and business relationships with the County. Through the adoption of the Nondiscrimination, Prevention of Sexual Harassment, Reasonable Accommodation for Persons with Disabilities, and the Language Access and Effective Communication Policies, the Board of Supervisors reaffirms its expectation that each County official and employee is responsible for maintaining a workplace that is free from unlawful discrimination, harassment, and retaliation.

As Department Head, my signature below verifies the accuracy of this report and affirms my commitment to equal opportunity and civil rights, as outlined in County policies and ordinances.

DocuSigned by:

*Henry Gonzales*

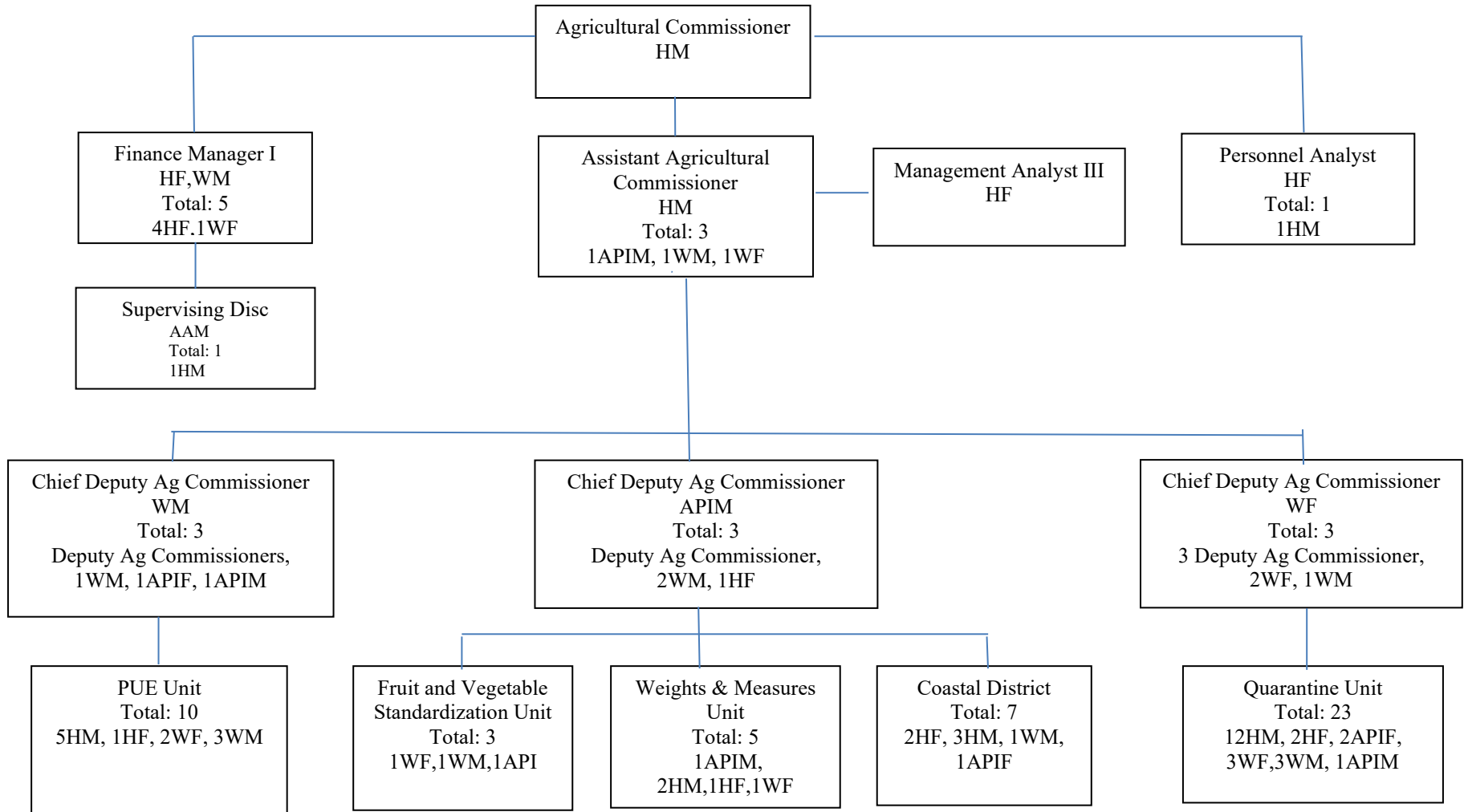
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Henry Gonzales

Agricultural Commissioner/Sealer of Weights & Measurers

## Section 2 Organizational Profile Agricultural Commissioner's Office



M – Male      F – Female

AA - African American; H – Hispanic; API – Asian/Pacific Islander; W - White other than Hispanic; AI – American Indian/Alaskan Native

## **Section 3**

### **Department's Workforce Analysis Chart (MC-HRM-EO-0003)**

This is the cover sheet for this section. Place a copy of your Department's workforce analysis chart here.

Run Date : 03/15/2022

Job Group Within Department

Run Time : 11:16 AM

2020-2021 Job Group Metrics

### Cover Page

#### Parameters and Prompts

Home Department:	2810
Occupational Group:	*
Title:	*

#### Report Description

The Monterey County Workforce Analysis Chart for Job Classifications within Job Groups Report is a listing and count of ethnicity, gender, classification and job group within Department(s).

County of Monterey Workforce Analysis Chart

Run Date : 03/15/2022

Job Group Within Department

Run Time : 11:16 AM

2020-2021 Job Group Metrics

**2810 - Agriculture Commissioner**

**JOB GROUP 01: Management II - (30.4% Minority Availability) - (51.1% Female Availability)**

Title	EEO Cat Code	Total Employees			Minorities			Male					Female					Totals					Hours	
		M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
ASSISTANT AGRICULTURAL COMMISSIONER	OA	1	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0
<b>TOTAL Management II</b>		1	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0
		0.0%			100.0%													0.0%	0.0%	100.0%	0.0%	0.0%		

**JOB GROUP 02: Management I - (32.7% Minority Availability) - (48.2% Female Availability)**

Title	EEO Cat Code	Total Employees			Minorities			Male					Female					Totals					Hours	
		M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
CHIEF DEPUTY AGRICULTURAL COMMISSIONER	OA	2	1	3	1	0	1	1	0	0	1	0	1	0	0	0	0	2	0	0	1	0	3	0
<b>TOTAL Management I</b>		2	1	3	1	0	1	1	0	0	1	0	1	0	0	0	0	2	0	0	1	0	3	0
		33.3%			33.3%													66.7%	0.0%	0.0%	33.3%	0.0%		

**JOB GROUP 03: Professionals - Administration - (49.2% Minority Availability) - (62% Female Availability)**

Title	EEO Cat Code	Total Employees			Minorities			Male					Female					Totals					Hours	
		M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
AGRICULTURAL PROGRAMS BIOLOGIST	P	0	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	1	0
DEPUTY AGRICULTURAL COMMISSIONER	OA	5	3	8	0	2	2	4	0	0	0	1	0	1	1	0	0	5	0	1	1	0	8	0
FINANCE MANAGER I	P	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0
GIS ANALYST III	P	1	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0
MANAGEMENT ANALYST III	P	0	1	1	0	1	1	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	1	0
PERSONNEL ANALYST	P	0	1	1	0	1	1	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	1	0
<b>TOTAL Professionals - Administration</b>		7	6	13	0	4	4	6	0	0	0	2	0	3	1	0	0	8	0	3	1	0	13	0
		46.2%			30.8%													61.5%	0.0%	23.1%	7.7%	0.0%		

County of Monterey Workforce Analysis Chart

Run Date : 03/15/2022

Job Group Within Department

Run Time : 11:16 AM

2020-2021 Job Group Metrics

2810 - Agriculture Commissioner

JOB GROUP 13: Paraprofessional - Technicians II - (60.6% Minority Availability) - (70.8% Female Availability)

Title	EEO Cat Code	Total Employees			Minorities			Male					Female					Totals					Hours	
		M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
AGRICULTURAL INSPECTOR/BIOLOGIST III	T	15	10	25	11	6	17	4	0	9	2	0	4	0	3	3	0	8	0	12	5	0	25	0
WEIGHTS/MEASURES INSPECTOR III	T	2	0	2	2	0	2	0	0	1	1	0	0	0	0	0	0	0	0	1	1	0	2	0
<b>TOTAL Paraprofessional - Technicians II</b>		17	10	27	13	6	19	4	0	10	3	0	4	0	3	3	0	8	0	13	6	0	27	0
		37.0%			70.4%													29.6%	0.0%	48.1%	22.2%	0.0%		

JOB GROUP 14: Paraprofessional - Technicians I - (51.5% Minority Availability) - (70.9% Female Availability)

Title	EEO Cat Code	Total Employees			Minorities			Male					Female					Totals					Hours	
		M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
AGRICULTURAL ASSISTANT I	PP	1	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0
AGRICULTURAL ASSISTANT II	PP	7	2	9	6	2	8	1	0	6	0	0	0	0	2	0	0	1	0	8	0	0	9	0
AGRICULTURAL INSPECTOR/BIOLOGIST I	PP	1	3	4	1	2	3	0	0	1	0	0	1	0	2	0	0	1	0	3	0	0	4	0
AGRICULTURAL INSPECTOR/BIOLOGIST II	T	2	0	2	1	0	1	1	0	1	0	0	0	0	0	0	0	1	0	1	0	0	2	0
PERSONNEL TECHNICIAN-CONFIDENTIAL	PP	1	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0
SUPERVISING DEPARTMENTAL INFORMATION SYSTEMS COC	PP	1	0	1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	1	0
WEIGHTS/MEASURES INSPECTOR I	PP	1	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0
WEIGHTS/MEASURES INSPECTOR II	T	0	2	2	0	1	1	0	0	0	0	0	1	0	1	0	0	1	0	1	0	0	2	0
<b>TOTAL Paraprofessional - Technicians I</b>		14	7	21	12	5	17	2	1	11	0	0	2	0	5	0	0	4	1	16	0	0	21	0
		33.3%			81.0%													19.0%	4.8%	76.2%	0.0%	0.0%		



County of Monterey Workforce Analysis Chart

Run Date : 03/15/2022

Job Group Within Department

Run Time : 11:16 AM

2020-2021 Job Group Metrics

2810 - Agriculture Commissioner

JOB GROUP 17: Office Clerical II - (79.1% Minority Availability) - (85.9% Female Availability)

Title	EEO Cat Code	Total Employees			Minorities			Male					Female					Totals					Hours		
		M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T	
ACCOUNTING TECHNICIAN	OC	0	1	1	0	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	1	0	0	1	0
ADMINISTRATIVE SECRETARY-CONFIDENTIAL	OC	0	1	1	0	0	0	0	0	0	0	0	1	0	0	0	0	1	0	0	0	0	0	1	0
OFFICE ASSISTANT III	OC	0	2	2	0	1	1	0	0	0	0	0	1	0	1	0	0	1	0	1	0	0	2	0	
SENIOR ACCOUNT CLERK	OC	0	2	2	0	2	2	0	0	0	0	0	0	0	2	0	0	0	0	2	0	0	2	0	
<b>TOTAL Office Clerical II</b>		0	6	6	0	4	4	0	0	0	0	0	2	0	4	0	0	2	0	4	0	0	6	0	
		100.0%			66.7%													33.3%	0.0%	66.7%	0.0%	0.0%			

JOB GROUP 18: Office Clerical I - (57.8% Minority Availability) - (79% Female Availability)

Title	EEO Cat Code	Total Employees			Minorities			Male					Female					Totals					Hours	
		M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
DATA ENTRY OPERATOR II	OC	1	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0
<b>TOTAL Office Clerical I</b>		1	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	1	0
		0.0%			100.0%													0.0%	0.0%	100.0%	0.0%	0.0%		

TOTAL - 2810 Agriculture Commissioner	Total Employees			Minorities			Male					Female					Totals					Hours	
	M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
	42	30	72	28	19	47	13	1	23	4	0	11	0	15	4	0	24	1	38	8	0	72	0
	41.7%			65.3%													33.3%	1.4%	52.8%	11.1%	0.0%		

GRAND TOTAL	Total Employees			Minorities			Male					Female					Totals					Hours	
	M	F	T	M	F	T	W	AA	HIS	API	AI	W	AA	HIS	API	AI	W	AA	HIS	API	AI	F/T	P/T
	42	30	72	28	19	47	13	1	23	4	0	11	0	15	4	0	24	1	38	8	0	72	0
	41.7%			65.3%													33.3%	1.4%	52.8%	11.1%	0.0%		

## Section 4

### Personnel Activity

Job Group: 03	New Hires		Promotions – Into Job Group		Promotions – Within Job Group		Voluntary Terminations & Retirements	
	Males	Females	Males	Females	Males	Females	Male	Females
White			1					
African American								
Asian/Pacific Islander	1							
American Indian/ Alaskan Native								
Hispanic				1				1
TOTAL (count each person only once)	1	0	1	1	0	0	0	1
	Involuntary Terminations (Non-Probationary)		Releases During Probationary Period		Corrective Actions		Layoffs	
	Males	Females	Males	Females	Males	Females	Male	Females
White								
African American								
Asian/Pacific Islander								
American Indian/ Alaskan Native								
Hispanic								
TOTAL (count each person only once)	0	0	0	0	0	0	0	0

Job Group: 14	New Hires		Promotions – Into Job Group		Promotions – Within Job Group		Voluntary Terminations & Retirements	
	Males	Females	Males	Females	Males	Females	Male	Females
White			1			1		
African American								
Asian/Pacific Islander								
American Indian/ Alaskan Native								
Hispanic	4		1		3			1
TOTAL (count each person only once)	4	0	2	0	3	1	0	1
	Involuntary Terminations (Non-Probationary)		Releases During Probationary Period		Corrective Actions		Layoffs	
	Males	Females	Males	Females	Males	Females	Male	Females
White	2							
African American								
Asian/Pacific Islander								
American Indian/ Alaskan Native								
Hispanic	2							
TOTAL (count each person only once)	4	0	0	0	0	0	0	0

Job Group: 17	New Hires		Promotions – Into Job Group		Promotions – Within Job Group		Voluntary Terminations & Retirements	
	Males	Females	Males	Females	Males	Females	Male	Females
White		1				1		
African American								
Asian/Pacific Islander								
American Indian/ Alaskan Native								
Hispanic						1		
TOTAL (count each person only once)	0	1	0	0	0	2	0	0
	Involuntary Terminations (Non-Probationary)		Releases During Probationary Period		Corrective Actions		Layoffs	
	Males	Females	Males	Females	Males	Females	Male	Females
White								
African American								
Asian/Pacific Islander								
American Indian/ Alaskan Native								
Hispanic								
TOTAL (count each person only once)	0	0	0	0	0	0	0	0

Job Group: 18	New Hires		Promotions – Into Job Group		Promotions – Within Job Group		Voluntary Terminations & Retirements	
	Males	Females	Males	Females	Males	Females	Male	Females
White								
African American								
Asian/Pacific Islander								
American Indian/ Alaskan Native								
Hispanic					1			
TOTAL (count each person only once)	0	0	0	0	1	0	0	0
	Involuntary Terminations (Non-Probationary)		Releases During Probationary Period		Corrective Actions		Layoffs	
	Males	Females	Males	Females	Males	Females	Male	Females
White								
African American								
Asian/Pacific Islander								
American Indian/ Alaskan Native								
Hispanic								
TOTAL (count each person only once)	0	0	0	0	0	0	0	0

## Section 5

### Recruitment - Data

(Please include information for each underutilized job group. Please include information about the

Job Group: 03	Applicants		Applicants Who Met Minimum Qualifications (Initial Screening)		Applicants Placed on Eligible List		Applicants Interviewed		Applicant Hired for the Position	
	Males	Females	Males	Females	Males	Females	Males	Females	Males	Females
White	4	1	2	1	2	1	2	1	1	
African American	1									
Asian/Pacific Islander	2	1	1	1	1	1	1	1	1	
American Indian/Alaskan Native										
Hispanic	4	3	3	2	3	2	3	2		
TOTAL (count each person once only)	11	5	6	4	6	4	6	4	2	0

Job Group: 03	Application Screeners (SMEs)		Interview/Oral Board Panelists		Targeted outreach locations that received the job announcement and discuss any challenges
	Males	Females	Males	Females	
White		2	1		Job announcements are sent statewide to other Ag Commissioner's Offices, other Monterey County offices, CDFA (California Department of Food and Agriculture), NAACP, Association of Asian Pacific Community Health Organization, Chinese American Citizens Alliance, Filipino Community of Salinas, Santa Cruz County Women's Commission and California State Colleges. Our Department is made up of positions which require a Bachelor's degree from an accredited four-year college in specific areas of study. Most of our supervising positions require licensing. We work closely with CDFA to acquire a list of all licensed staff in California, this has been the best course of action
African American					
Asian/Pacific Islander	1			1	
American Indian/Alaskan Native					
Hispanic		1	2	1	
TOTAL (count each person once only)	1	3	3	2	

**Department's challenges in recruiting a diverse and qualified applicant pool.)**

Job Group: 17	Applicants		Applicants Who Met Minimum Qualifications (Initial Screening)		Applicants Placed on Eligible List		Applicants Interviewed		Applicant Hired for the Position	
	Males	Females	Males	Females	Males	Females	Males	Females	Males	Females
White	1	24	1	11		13		7		1
African American		3		2		1		1		
Asian/Pacific Islander	2	3	1	1	1	1	1			
American Indian/Alaskan Native	1				1					
Hispanic	8	45	4	32	4	13		1		
TOTAL (count each person once only)	12	75	6	47	6	28	1	9	0	1

Job Group: 17	Application Screeners (SMEs)		Interview/Oral Board Panelists		Targeted outreach locations that received the job announcement and discuss any challenges
	Males	Females	Males	Females	
White		1		1	Outreach was done by Treasurer/Tax Collector department. Ag Commissioners Office shared a referral.
African American					
Asian/Pacific Islander					
American Indian/Alaskan Native					
Hispanic		1	2	1	
TOTAL (count each person once only)		2	2	2	

## **Section 6**

### **(Under the County's Equal Opportunity Plan Chapter 5: Designation of Responsibility)**

#### **Action-Oriented Programs**

##### **Recruitment**

What collaborative relationships has your Department established with community groups and stakeholders? How have these relationships supported the Department's recruitment efforts? How many selective certification waivers did your department request last year? How many were granted and why?

We continue to develop and enhance our relationship with local colleges. Our licensing staff requires a four-year degree with an emphasis in science and agriculture, and we still struggle with recruiting candidates from local schools; however, many of our internal staff has taken courses at Hartnell and CSUMB to improve their skills and/or promote within the Department.

Our Department had two selective certification waivers, which was granted, for our Deputy Agricultural Commissioner and Finance Manager I recruitment in 2021.

The Deputy Agricultural Commissioner waiver was granted because the job title Deputy Agricultural Commissioner is not subject to the screening requirement in the Garza Consent Decree, pursuant to §2106 of the Food and Agricultural Code. These are hard to fill positions which require that the applicant possess a Deputy license issued by the California Department of Food and Agriculture (CDFA).

The Finance Manager I waiver was granted for a short recruitment in order to be able to have our current Finance Manager train the new Finance Manager. Training for this position is very important, the Finance Manager position is very complex, and has a unique financial reporting associated to the position. There was no eligible list for past recruitments, as the current Finance Manager had been in that position for the past 17 years.



## **Hiring**

What selection criteria does the department use in the fit interview?

We use the following selection criteria to determine fit: Adaptability, Trainability, Demonstrated Communication Skills, Problem Solving Capabilities, Conflict Management and Customer Service Skills.

How does your Department ensure diversity on panels of screeners and interviewer panelists?

We have developed relationships with Departments within the County, Agricultural Commissioner Offices outside of Monterey County, State agencies, and the local Agricultural Community to include diverse external screeners and panel members for final selection interviews.

What training or information is given to screeners and interview panelists to help minimize bias in decision-making?

Panel briefing emphasizes the need to focus on the responses of the candidates; presented information rather than preconceived judgments; and facts rather than opinions. Screeners and panelists are given instruction to rate without regard to protected categories under state and federal law. Interview panelists are informed of common rating errors and given examples of sub-conscious bias and how to avoid these errors during the interview process. Being aware of this information throughout the interview process helps panelists avoid their own personal judgements and minimizes bias in the decision-making.

## **Promotions**

What processes, procedures, or systems have been implemented in your Department to support protected groups moving into senior job classifications beyond regular career progression (e.g., training, leadership development, mentoring, etc.)? How effective have these initiatives been in supporting promotional opportunities for women and people of color?

We invest into our Department staff, by supporting training for all staff. Our supervisory and management team provides training to staff members taking licensing

exams and supports peer mentoring and study sessions. We also utilize all resources available through Human Resources and the County's Learning and Development Network. We encourage and support participation in the California Association of Standards and Agricultural Professionals, Leadership Monterey County, and other educational events. We work continuously on our commitment to training our employees to improve development and retention in the Department.

Our initiatives have been very successful. In 2021, nine women and/or people of color were promoted.

How does your Department utilize performance evaluations to assess employees' commitment to building a diverse and inclusive workforce? How is this commitment considered when considering employees for promotional opportunities?

Performance evaluations are used as a career development tool to support the growth of all staff. Many of our employees have licensing requirements needed to be promoted. To maintain a diverse and inclusive atmosphere, even staff that has met the licensing requirements, must also fully meet standards on their performance evaluation before they are promoted.

## **Retention and Inclusion**

What data collection procedures/tools have you implemented to track the turnover rate for protected groups?

The Department utilizes the reports within Info Advantage to track the turnover rate for protected groups, specifically the report titled, "Employee Personnel Action Information with Ethnicity and Gender." More importantly, we pay attention to changes within the Department and actively look for opportunities to increase diversity. We also use the exit interview to gain feedback for areas of improvement

What does the data show regarding turnover rates of protected groups compared to your Department's general population?

In 2021, a total of four minority staff members left the department. One minority staff member left the Department for a job closer to home; one was a service retirement of long-term employee; and two staff members left due to temporary appointment ending.

Based on the data collected, what are the negative and positive trends you have found, and how will you act on them?

Although no significant trends in turnover rates have been identified, we continue to focus our efforts on recruitment to improve diversity.

What steps has the Department taken to ensure lactation accommodations for all its employees?

The Department has a designated room for lactation. Many of our employees work out in the field. For those employees needing accommodations, arrangements are made so that they are assigned to areas close to the office.

What is the Department's practice when an employee requests an accommodation?

Department Human Resources meets with every employee that makes a request for an accommodation, and works together with the County's Disability Services Coordinator for compliance and accommodation requests.

Does the Department conduct exit interviews? If so, what do you do with the answers to promote diversity and inclusion? If not, what alternative methods do you use to collect information regarding reasons for separation?

The Department conducts exit interviews. The Agricultural Commissioner and Human Resources reviews the responses to identify trends and to better understand staff experiences and the climate at the Department.

What has been the greatest success/es regarding inclusiveness in your Department?

Our greatest success is by "Growing Our Own" supervisors and higher-level managers to ensure continuing diversity in the future. We actively pursue qualified minority and women applicants for our entry-level positions, and perhaps more importantly, we mentor and provide staff with the opportunity to develop and advance through the various levels of their classifications and to promote into supervisory and management positions

What opportunities for improvement have you found, and how will you address them?

Since "Growing Our Own" supervisors and higher-level managers has been successful, the Department will continue its efforts to attract qualified minority and women applicants for our entry-level positions.

## Section 7

### Accomplishments and Resource Needs

Please highlight your Department's successes in achieving a diverse workforce in this section. Describe your Department's assessment of resource needs from the Civil Rights Office. Please share any suggestions and recommendations for improvement you can offer regarding current policies and procedures. Feel free to use examples or specify by job group.

Please include your Department's current compliance rates with required training offered by the Civil Rights Office. All employees must complete the Harassment and Discrimination Prevention Training and the Civil Rights Training every two years.

	Harassment and Discrimination Prevention Training	Civil Rights Training
Total number of Managers	18	18
Managers completed	18	17
Percent of Managers completed	100%	94%
Total number of Employees (non-supervisors/managers)	58	58
Employees (non-supervisors/managers) completed	58	56 (2 new hires are waiting for training session)
Percent of Employees (non-supervisors/managers) completed	100%	97%

## **Section 8**

### **Follow up requested by the Commission**

Please discuss any follow-up requested by the Commission during past years' presentations on the Departmental Equal Opportunity Plan in this section. Follow-up may occur via action, memorandum, or additional presentation to the Commission.

## Section 9

### Title VI of the Civil Rights Act Implementation (Under the County's [Title VI of the Civil Rights Act Implementation Plan](#))

	<b>Requirement</b>	<b>Implementation Notes</b>	<b>Completed</b>
<b>General</b>	Title VI notice at public counters		✓
	Internal process to forward discrimination complaints to Civil Rights Office		✓
	Nonstandard contracts include a nondiscrimination clause		✓
	Data is collected on the ethnicity and language of people served		✓
<b>Language Access</b>	Departmental language assessment completed		✓
	Vital documents translated into Spanish		✓
	Website – minimize PDFs. When using PDFs, include a Spanish version	Some documents are translated into Spanish.	✓
	Procedures and budget for the use of interpretation and translation services		✓
	Public voicemails in English and Spanish		✓
	Public counters: language charts available		✓
	Public counters: all signage in English and Spanish		✓
	Public counters: procedures to have bilingual staff available		✓

<b>Community Engagement</b>	Projects, programs, policies, and services reflect County stakeholders and are sensitive to diverse demographic backgrounds		✓
	Analyzed potential disproportionate adverse human health or environmental effect on communities of color, tribal communities, or others underrepresented in the public process		✓
	Considerations taken to ensure equitable engagement		✓
	Key community engagement contacts established		✓