

To: Elevate Energy, Program Administrator, Illinois Solar for All Program
From: Juliana Pino, Little Village Environmental Justice Organization
& Participants in the Illinois Solar for All Working Group
Date: 01/30/2019
Re: Illinois Solar for All Working Group Comments on Environmental Justice Provisions for Illinois Solar for All

Dear Elevate Energy Administrative Team for the Illinois Solar for All Program:

The Illinois Solar for All Working Group is pleased to deliver the enclosed comments on the Environmental Justice provisions for the Illinois Solar for All Program. This memo describes an overview of the Illinois Solar for All Working Group.

Background: Illinois Solar for All Working Group

The Illinois Solar for All Working Group (the Working Group) formed from a subset of members of the Illinois Clean Jobs Coalition, who had comprised an Environmental Justice-Solar-Labor Caucus (the Caucus) during the negotiation of policies that would become the Future Energy Jobs Act (FEJA). The group formed in order to bring the best practices and policies to the Illinois energy landscape that would serve to maximize benefits to the economically disadvantaged households and communities that targeted programs are intended to serve. The group was co-facilitated by a representative of a solar company, Amy Heart of Sunrun, and a representative of an environmental justice group, Juliana Pino of the Little Village Environmental Justice Organization.

Following passage of FEJA in December 2016, the Caucus expanded into the Illinois Solar for All Working Group, an open membership group including experts on environmental justice, environmental advocacy, consumer protection, solar business, low-income solar policy, energy efficiency, job training, program design, and other areas, who have substantive research and experience to bring to bear on implementation of Illinois Solar for All. Over 75 participants include representatives from the following organizations and others:

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| BIG: Blacks in Green | New Life Ministries of Danville |
| Central Road Energy LLC | ONE Northside |
| Environmental Law and Policy Center | People for Community Recovery |
| Faith in Place | Seven Generations Ahead |
| Illinois People's Action | Sierra Club Illinois |
| Little Village Environmental Justice Organization | Southeast Side Coalition to Ban Petcoke |
| Metanoia Centers for Innovation | Trajectory Energy |
| Natural Resources Defense Council | Vote Solar |

Working Group Process

The Working Group began convening in January 2017, and has had monthly full-group meetings until the present time. In tandem, the Working Group operates with sub-teams that focus on specific areas relevant to the policies at hand and future work on the program. These sub-teams include: Program Administration & Evaluation, Consumer Protection & Financing, Education & Engagement, Job Training, and Project Workshop. Each sub-team was facilitated by leads and co-leads and meets between monthly full-group meetings with frequency depending on the time of year.

A draft White Paper was delivered to the IPA on May 5, 2017. Many Working Group participants attended IPA's May 2017 workshops and helped develop responses to IPA's June 6, 2017 Request for Comments on the Long-Term Renewable Resources Procurement Plan.¹ A final White Paper was published on July 11, 2017 on lowincomesolar.org.² The Working Group also submitted a response to the Draft Long-Term Renewable Resources Procurement Plan on November 13, 2017.³ Additionally, the group has submitted comments on: Community Solar Consumer Protection & Marketing Guidelines Draft Documents and Illinois Adjustable Block Program Draft Guidebook to InClima on December 10, 2018, as well as Grassroots Education and Approved Vendor components of IL Solar for All on January 9, 2019.

Program Principles for Illinois Solar for All

During the negotiation of FEJA, the Caucus membership collectively agreed upon the following policy principles to guide our work moving forward. These principles were rooted in the *Low-Income Solar Policy Guide*⁴ authored by GRID Alternatives, Vote Solar, and the Center for Social Inclusion; further adapted through iterative deliberations in the Caucus; and ultimately adopted by the Working Group. The principles include:

- **Affordability and Accessibility.** Offers opportunities for low-income residents to invest in solar through a combination of cost savings and support to overcome financial and access challenges. Creates economic opportunities through a job training pipeline. Supports skill development for family-supporting jobs, including national certification and apprenticeship programs.
- **Community Engagement.** Recognizes community partnerships are key to development and implementation, ensuring community needs and challenges are addressed. Strive to maximize projects located in, and serving, environmental justice (EJ) communities. Allows for flexibility for non-profit/volunteer models to participate, and strives to meet potential trainees where they are, with community-led trainings.
- **Sustainability and Flexibility.** Encourages long-term market development, and will be flexible to

¹ <https://www.illinois.gov/sites/ipa/Documents/ILSfA-Working-Group-Response-RequestforComments.pdf>

²

http://www.lowincomesolar.org/wp-content/uploads/2017/07/20170711-ILSfA-Working-Group-White-Paper_Final_wAppendices.pdf

³

<https://www2.illinois.gov/sites/ipa/Documents/2018ProcurementPlan/2018-LTRenewable-Illinois-Solar-for-All-Working-Group-Comments.pdf>

⁴ www.lowincomesolar.org

best serve the unique low-income market segment over time and as conditions change. Program administrator ensures community engagement, statewide geographic equity, and flexibility to meet goals. Job training program includes all training partners in design and implementation. Training offerings should come through diverse channels including utilities, unions, tech schools, non-profits, government agencies, and existing community-based job training organizations.

• **Compatibility and Integration.** Low-income program adds to, and integrates with, existing renewable energy and energy efficiency programs, and supports piloting of financing tools such as PAYS (pay-as-you-save), on-bill financing, PACE or community-led group buy programs. Jobs training programs will strive to ensure low-income solar installations incorporate workforce development, including coordinating opportunities for job training partners and individual trainees from the same communities that the low-income solar program aims to serve.

The Working Group researched and prepared the enclosed comments to deliver high quality information and recommendations on considerations for the Illinois Solar for All Program. The contents are not intended to reflect universal consensus on any point amongst working group members. These contents reflect extensive deliberation regarding aspects that the Working Group believes are important to the Program's success moving forward.

In closing, we make these recommendations and comments to ensure high-quality implementation for Illinois communities. Communities throughout Illinois need the opportunities and services the Illinois Solar for All Program will provide and the support of groups with substantive experience in the solar industry and low-income solar in particular. Please do not hesitate to contact us with questions or comments in regards to this matter.

Dear Elevate Energy Administrative Team for the Illinois Solar for All Program:

The Illinois Solar for All Working Group appreciates this opportunity to provide comments on the Environmental Justice components of the Illinois Solar for All program proposed in presentations and stakeholder sessions hosted by Elevate Energy (hereinafter the “Administrator”). It is clear that the program administration team has put significant and careful thought into how to best ensure participation of environmental justice communities in the Illinois Solar for All Program. These comments are intended to provide guidance and feedback on how the Illinois Solar for All Working Group (hereinafter “Working Group”) views the key considerations, best practices, and outstanding questions for administration of the Environmental Justice provisions of Illinois Solar for All. The Working Group urges the Administrator to continue to consider the broad and long-standing obstacles that disadvantaged communities, including environmental justice communities, face toward participation in like programs and processes. Maintaining flexibility will be key to eliminating undue obstacles for community participation and benefits, maximizing the opportunities for genuine participation by environmental justice communities in the program. The Working Group commends the Administrator for their consideration of these key provisions critical to the success of the Illinois Solar for All program overall.

ENVIRONMENTAL JUSTICE MAPPING METHODOLOGY

The Working Group applauds the Administrators and the Agency in their thoughtful use of cumulative impacts analysis based on USEPA’s EJSCREEN tool and the CalEnviroScreen methodology, as outlined in the program details and the Long-Term Renewable Resources Procurement Plan (“LTRRPP”). Cumulative impacts analysis, of which EJSCREEN and the more robust CalEnviroScreen are examples, recognizes that some communities face a number of different environmental threats. At the same time, it accounts for the fact that a pound of pollution does not affect all individuals equally, but that certain individuals are more vulnerable to pollution, with vulnerability tracking certain sociodemographic characteristics. Cumulative impacts combines all of these factors to better represent the lived experience of highly burdened communities. Thus, such cumulative impacts mapping is crucial to ensuring that the Illinois Solar for All program is meeting the statutory intent of the program in serving low-income residents across the state and truly incentivizing siting of projects in environmental justice communities.

1. Is this the appropriate weighting?

The Administrator has chosen a methodology for weighting and scoring that follows the CalEnviroScreen methodology closely: environmental effects are given half the weight of environmental exposure factors, the socioeconomic factors are weighted equally among themselves, and lastly the environmental and socioeconomic factors are multiplied to calculate an overall Environmental Justice score. The Working Group supports the Administrator’s decision to follow the CalEnviroScreen methodology as closely as possible. The half-weighting of environmental effects relative to exposure factors makes sense, given that environmental effects are considered to make a smaller contribution to the burden of pollution than exposures do.

The Working Group also understands that the Administrator has relied on the set of 11 environmental and 6 socio-demographic indicators provided by US EPA’s EJSCREEN tool. The Working Group supports this decision, as well, as it represents a significantly more comprehensive analysis of the concept of environmental justice compared to Illinois EPA’s designation, which relied solely on the indicators of percent minority and percent low-income. At the same time, the Working Group believes that future cumulative impacts analyses that may be applied to the state of Illinois could benefit from including

additional indicators beyond those provided in EJSCREEN. EJSCREEN is limited to data that are available nationwide, and Illinois should be continuing to collect environmental, socio-demographic, and other data that could advance cumulative impact analyses within the state.

2. Do these results represent a reasonably accurate depiction of EJ communities in the state?

Mapping By Decile and Ensuring Program Benefits Reach Communities with Highest Scores

In analyzing the results and data released, the top 25% of scored areas obscures important differences between community areas in urban neighborhoods that have differing levels of both exposures and environmental factors, as well as social and economic vulnerability. Such a lack of differentiation may lead to a concentration of development of solar resources in and with communities at the lower end of scores in the top 25% and such development may not reach communities with higher environmental justice scores, experiencing higher burdens of exposures and environmental effects or socioeconomic stressors, or both. As a consequence, the environmental justice communities with the most severe cumulative vulnerabilities may inadvertently be excluded from the program. Examples of this effect have been found in past performance of energy efficiency programs where programs were widely targeted to lower-middle-income customers and low-income customers alike in the same program category – in these cases, the lower-middle-income customers tended to receive the bulk of program benefits and the low-income customers were largely excluded due to the additional costs and effort required to facilitate program provision for these customers.

To this end, the Working Group recommends an additional layer of analysis and mapping be conducted by the Administrator demonstrating relative EJ Scores by decile for block groups across the state. The Working Group further recommends that the Administrator put forward a methodology to incentivize distribution of projects across environmental justice communities utilizing the decile mapping results. This could be included in the project application portion of the program where projects proposed to be sited in environmental justice areas in the highest decile and second highest decile should be awarded priority or additional points in the Administrator's scoring rubric. Program provision by decile should subsequently be tracked in the program evaluation analysis of Illinois Solar for All such that evaluators and the Illinois Power Agency could understand how well the program is reaching percentile deciles, particularly those communities scoring highest. The evaluation could be particularly useful in regard to characterizing and responding to the particular challenges posed by program deployment in communities with scores in the highest deciles.

Advocates used the data and scores provided by the Administrator to create the enclosed example maps for Chicago, Rockford, Joliet, Aurora, Bolingbrook, Naperville, Decatur, and East Saint Louis. The enclosed maps illustrate how decile mapping of scores more clearly demonstrates differences between block group scores within these geographies. The enclosed maps only demonstrate the decile breakdown and do not additionally map the 25% cutoff. The Working Group recommends the Administrator produce additional mapping tools and maps displaying both the 25% analysis and a decile breakdown of scores. As one example of the multiple ways this could be done as determined by the Administrator, a map could include cross-hatching or other graphic overlay along with a color scale to demonstrate both characterizations in the same image.

Limitations of Relative Scoring Characterization of Urban, Suburban, and Rural Communities

The Working Group also recognizes the limitations of the methodology in relative characterizations of environmental justice communities across the state, particularly in comparing rural to urban areas, where the scoring emphasizes urban areas and under-emphasizes rural areas. The Working Group notes that this

is largely because EJSCREEN data is not as effective for tracking environmental stressor indicators in rural and some suburban areas as it is for urban environmental stressors. For this reason, while a more restrictive cutoff could lead to a more accurate depiction of urban environmental justice communities, the Working Group does not recommend utilizing a more restrictive binary cutoff than the 25% put forward in the LTRRPP and emphasized in this proposal due to the potential consequence that it could eliminate some rural or suburban areas from identification via the initial methodology. excellent

Provision of Resources to Enable Access by and Participation of Central Illinois, Southern Illinois, and Rural Communities Throughout IL

The Working Group recognizes the specific challenges and additional barriers to participation faced by communities in Central Illinois, Southern Illinois, and rural communities throughout the state. In light of the characterization of EJSCREEN data referenced immediately above, such communities may be frequent participants in the self-designation process and should receive special consideration. The Working Group recommends that the Administrator develop additional supports for these communities as they navigate the environmental justice designation mapping context and the self-designation process. These could include, but should not be limited to:

- an additional layer of support for prioritization of these communities in the Grassroots Education provision funding opportunities where they pertain to the environmental justice components of the program, including what is already highlighted in the subsequent response "Clear Incorporation of Self-Designation into Grassroots Education" to Question 5;
- as well as specific, tailored technical assistance by member(s) of the Program Administration team for community members, members of the public, and organizations in these areas, in addition to what is already highlighted in the subsequent response "Provision by Administrator of Technical Assistance" to Question 5.

Data Updating Frequency

The Working Group recommends that the Administrator clarify how frequently the mapping data, resulting scoring, and resulting maps and tools will be updated. This would aid vendor site identification and planning, as well as aiding members of the public accessing the information, including community members seeking to potentially submit self-designation proposals.

SELF-DESIGNATION METHODOLOGY

The Working Group commends the Administrator's responsive proposal for a process through which communities identifying as environmental justice communities that are not reflected in the mapping or scores produced by the aforementioned methodology can propose self-designation. Such a process will be fundamental to ensuring environmental justice communities throughout the state, particularly in rural areas, can be included in the Illinois Solar for All program.

3. Is this an acceptable approach to self-designation?

The Working Group expresses general support for this approach to self-designation and particularly commends the attention paid to the wide variety of experiences and factors that can contribute to a community identifying as an environmental justice community. The Working Group also puts forward the following additional recommendations to strengthen the approach further and enhance program accessibility to potential self-designators.

Treatment of Initial Self-Designation Process as Pilot Deployment Phase, Stakeholder Engagement in Modifications Post-Pilot, and Ongoing Stakeholder Engagement

The Working Group notes that self-designation may be a challenging and complex process to implement. It is likely additional important considerations that the Administrator, the Working Group, and other interested stakeholders have not foreseen will arise as the program is deployed. Thus, the Working Group recommends that the self-designation process be deployed in a pilot phase for at least the first three months. The Working Group recommends that the Administrator commit to revisiting the self-designation process and its functionality after the 3 month pilot to engage stakeholders to potentially develop changes to the methodology that will make the self-designation process more accurate and effective, which will enhance the success of the IL Solar for All Program overall. The Working Group further recommends that the Administrator develop a plan for continuing to engage stakeholders in an ongoing manner to evaluate functionality, incorporate best practices from other states' approaches in related contexts that could bear relevance, and revise the program in the future.

Removal of Quantitative Minimums and Averages and Provision of Ground Truthing

The Working Group recommends complete removal of all quantitative minimums (the two- or four-factor requirement) and "worse than average" calculation requirements from the self-designation process. This point is crucial to the success of self-designation, hence we have indicated this recommendation under both the acceptability of the approach both in this section of the Working Group's comments, as well as the section of the comments pertaining to the quantitative portion of the proposal (Question 7) below. Quantitative requirements may create unfair disadvantages for self-designators with fewer resources. The Working Group recognizes that low-income communities with a history of environmental exposures and social and economic vulnerability face immense challenges. First, groups may face challenges in accessing the kinds of quantitative data that reflect their actual experiences and/or consequential impacts from industrial site(s) or events. In some instances, this hurdle may exist because agencies have traditionally failed to collect critical data, including baseline data for a range of indicators, relevant to environmental justice communities. This is particularly true for geographic areas that face larger data gaps, generally.

The gap in available data is highlighted in the groundbreaking 2011 *Hidden Hazards* report by the Liberty Hill Foundation,⁵ which called attention to the omissions and errors in regulatory databases with respect to sources negatively impacting environmental justice communities. The report describes the process of "ground truthing" information available in regulatory databases against the reality in overburdened communities, a critical process that has yet to be undertaken for many if not most communities across Illinois, including environmental justice communities. In addition, Los Angeles County recently undertook a "Groundtruthing" process⁶ in conjunction with its "Green Zones Program," explaining that ground truthing "involves surveying and documenting potential environmental hazards in a community through collaboration with community members and organizations."

The Working Group strongly recommends that such a process be initiated both to improve the data on which the quantitative scoring process is based, as well as to refine and improve the self-designation process, i.e. that a collaborative approach involving community members and organizations be utilized in surveying and documenting activities for the purposes of supplementary information consideration

⁵ Liberty Hill Foundation. (2010). *Hidden Hazards: A Call to Action for Healthy, Livable Communities*. Retrieved from: <https://www.libertyhill.org/sites/libertyhillfoundation/files/hidden-hazards-low-res-version.pdf>

⁶ Los Angeles County Department of Regional Planning. Green Zones Program: Groundtruthing information can be located here: <http://planning.lacounty.gov/greenzones/groundtruthing>

accompanying self-designation proposal. Data resulting from this approach is more descriptive of participating communities in question and can also fill gaps, confirm, or clarify other data. Second, even where good data is available, groups may face challenges in procuring the kinds of capacity required to access and process data required for the purposes of submitting a proposal. The resulting data and collaboration from supplementary “ground truthing” activities would help alleviate this gap. A more flexible approach, which considers the totality of quantitative or qualitative information presented, is recommended. Additional recommendations from the Working Group on specifics around quantitative and qualitative data can be found in the subsequent responses to Questions 5-8.

Geographic Representation on Environmental Justice Community Self-Designation Committee

The Working Group supports the Administrator’s proposal to convene an Environmental Justice Community Self-Designation Committee (“the Committee”) comprised of a combination of Program Administration team members and additional Environmental Justice expert(s) for the purposes of evaluating submitted self-designation proposals. The Working Group recommends that the committee should include multiple Environmental Justice experts who are representative of different geographic regions in the state and types of environmental justice communities by geographic diversity.

Submission Review Window and Program Timing

The Working Group recommends that the Administrator provide guidance to potential self-designators on how timing of self-designation proposal submission and review aligns with the implementation of the incentives, grassroots education, and other components of the program. For example, providing information on key program dates could be important for potential self-designators to understand what timing they may want to pursue for submitting a proposal in order to facilitate participation in project development, program benefits, and grassroots education. The Working Group also recommends that the Administrator provide an estimated review timeline for submitted proposals such that self-designators can relate the proposal review window to the rest of the key program dates and timing per the above. The Working Group recognizes that the Administrator may want to set a flexible review schedule such that comprehensive self-designation proposals, including those that may include geographic areas containing block groups already designated as environmental justice communities, may receive expedited reviews.

Multiple Submissions from Same Community

The Working Group recommends that the Administrator not prohibit multiple submissions from what may be understood to be the same communities for the purposes of self-designation. Interest in the program is such that it is possible that self-designators may work on concurrent proposals without awareness of other proposals or coordinating amongst each other as they prepare. To address the associated administrative challenge, the Working Group recommends that the Committee could consider including a process allowing joint reviews of multiple self-designation proposals covering proximate or the same block groups or areas that are referencing overlapping geographic boundaries.

Site Visits by Committee Members

The Working Group recommends that the Administrator consider including a method by which communities could request a site visit from the Administrator team and/or members of the Committee. Recognizing that such a visit could provide the opportunity for in-person witnessing in communities being proposed for inclusion, in-person documentation that could add strength to self-designation proposals, as well as in-person meeting(s) with self-designators for the purposes of additional discussion of submitted proposals. Such site visits could be part of any “ground truthing” process the Administrator carries out as referenced in “Removal of Quantitative Minimums and Averages and Provision of Ground Truthing” section above in a preceding portion of the Working Group’s response to Question 3.

Provision of Program Materials in Multiple Languages

The Working Group recommends that the Administrator translate program materials into multiple additional languages and develop a process by which the Committee could review proposals submitted with supporting information in other languages.

Provision by Administrator of Technical Assistance

Additionally, the Working Group recommends that the Administrator furnish a clear point of contact for support, question answering, and review of prepared materials for potential community self-designators before the point of submission and during the Committee process. Such technical assistance may enable communities to participate that might otherwise be unable to navigate the self-designation process without this resource.

Clear Incorporation of Self-Designation into Grassroots Education

The Working Group recommends that the Administrator make explicit that where Grassroots Education providers could focus campaigns on environmental justice, such proposals could focus on the self-designation components. Grassroots Education elucidating the relationship between self-designation and the rest of the program could be crucial to increasing access, particularly where communities may not be aware of the mapping process or whether they are or are not currently designated as environmental justice communities.

4. Are there additional geographic boundaries that will need to be used to self-identify a community?

The Working Group recommends that additional geographic boundaries could include railways, highways, rivers, and other geographic, cultural, or historic landmarks that could be subsequently mapped.

5. Are there other factors that should be expressly included in the process?

The Working Group recommends the following additional factors for inclusion in the respective sections of the self-designation process.

Part A: Basic Information

The Working Group recommends that additional qualitative measures be included in the series listed in the following sentence: “*Your answer may draw from history, culture, economics, geography, or other considerations you deem relevant.*”

Alternatively, reordering the self-designation process description such that Part A is immediately followed by Part C (Qualitative Support) could help clarify the relationship between the Basic Information section and the Qualitative Support factors outlined.

Part B: Quantitative Support

Removal of Average Level Demonstration

In keeping with the Working Group’s “Removal of Quantitative Minimums and Averages” recommendation in the response to Question 3 on the acceptability of the approach, the Working Group recommends that the Administrator entirely remove the included requirement that currently reads as

follows on page 2 of the Self-Designation Process Proposal document with removal indicated through strikethrough:

~~“Each new quantitative variable that you present must show an average level for your community that is above the Illinois statewide average for that metric. Please explain your methodology for calculating or finding the average level for your community and the statewide average.”~~

Quantitative Factors

The Working Group supports the quantitative factors listed by the Administrator. The Working Group recommends the following additional quantitative factors and potential data sources be included in the list provided by the Administrator in the self-designation methodology. These additions are designed to expressly include quantitative information related to housing inequities and environmental health outcomes and explicitly allow for reference data on these areas to serve as supporting quantitative evidence.

- **Rental and Housing Assistance Data** – The U.S. Department of Housing and Urban Development (“HUD”) maintains federal databases tracking federal housing assistance programs.⁷ The Center on Budget and Policy Priorities compiled some of these data sources to indicate examples of the major types of Federal Rental Assistance that households in Illinois access,⁸ and these include: housing choice vouchers, public housing, Section-8 project based, specific programs for elderly residents and persons with disabilities, and the U.S. Department of Agriculture programs. HUD also maintains a database of local Public Housing Authorities that, in turn, maintain their own relevant data on public housing provision at the local level throughout the state.⁹ The example data could include information on: gentrification and displacement, volume of public housing, housing choice voucher utilization, volume of various kinds of low-income housing and/or federally assisted housing including public housing, trailer homes, senior living facilities, and more.
- **Environmental Health Susceptibility and Impacts** -- The Centers for Disease Control and Prevention (“CDC”) maintains federal databases tracking environmental health effects with look-up tools by zip code and county.¹⁰ The Illinois Department of Public Health (“IDPH”) maintains state health data and statistics available to the public broken down by different scales depending on the individual database.¹¹ IDPH also maintains a database of Health Regions and local health departments that, in turn, maintain their own relevant data on health.¹² The example data could include information on the following, sourced from the CDC environmental health

⁷ Such databases can be accessed in the federal Data Catalog located here:

<https://catalog.data.gov/dataset?publisher=US%20Department%20of%20Housing%20and%20Urban%20Development>

⁸ Center on Budget and Policy Priorities. (2017). *Illinois Fact Sheet: Federal Rental Assistance*. Retrieved from:

<https://www.cbpp.org/sites/default/files/atoms/files/4-13-11hous-IL.pdf>

⁹ HUD Local Public Housing Authority information database can be located here:

https://www.hud.gov/program_offices/public_indian_housing/pha/contacts

¹⁰ CDC National Environmental Public Health Tracking Network data can be located here:

<https://ephtracking.cdc.gov>

¹¹ IDPH Data & Statistics resources can be located here: <http://www.dph.illinois.gov/data-statistics>

¹² IDPH Health Regions and Local Public Health Authorities information database can be located here:

<http://www.dph.illinois.gov/data-statistics>

effects data categories:¹³ asthma, Chronic Obstructive Pulmonary Disease, and other respiratory illnesses; birth defects; heat stress illness; reproductive and birth outcomes (in addition to the low birthweight information already included by the Administrator); developmental disabilities; childhood lead poisoning; heart disease; cancer; carbon monoxide poisoning; hormone disorders, etc. It should be noted that these large health databases at times face challenges with both data quality and coverage, which can be particularly notable for environmental justice communities. Thus, the self-identification process should also consider other sources of health information, such as public health studies conducted on specific areas.

The Working Group recommends that the Administrator explicitly affirm that proposals may also include quantitative data to support any of the additional qualitative factors in Part C of the proposal, as well as any other relevant quantitative information not specifically listed herein.

Part C: Qualitative Support

The Working Group supports the merits of qualitative data in characterizing complex experiences, in addition to quantitative data, as important sources for self-designation proposals. The Working Group supports the qualitative factors listed by the Administrator, including:

- “Historical events (e.g. fire, housing crisis) – *please describe how these events impacted your community on a localized level.*
- Environmental disasters and/or severe weather events - *please describe how these events impacted your community on a localized level.*
- Plant (e.g. manufacturing, fossil generation) openings/closures/operations
- Economics - mass migrations, businesses closing, mortgage crisis
- Community Toxicity & Poor Health (e.g. number of dialysis facilities, number of abandoned gas stations and/or homes, lead exposure in children)
- Resource Starvation (e.g. lack of fresh food outlets, limited access to infrastructure)”

The Working Group recommends that “Plant [...] openings/closures/operations” be modified to read “Industrial facility [...] openings/closures/operations” to affirm that many kinds of industrial activities could be offered as qualitative support factors.

Reflecting the complex, intersectional realities impacting social and economic vulnerabilities in environmental justice communities, the Working Group recommends the addition of the following factors to the aforementioned list of qualitative factors already provided:

- Educational Inequity (*e.g. lack of access to educational opportunities locally, school closings, etc.*)
- Incarceration and Criminal Justice (*e.g. prevalence of incarceration of community residents, prevalence of formerly incarcerated community residents, interactions with carceral system, arrests, detention and deportation, etc.*)
- Housing Inequity and Public Housing (*e.g. gentrification and displacement, usage of housing assistance programs such as Section 8 or housing choice vouchers, volume of or proximity to various kinds of low-income housing and/or federally assisted housing including public housing, trailer homes, senior living facilities, etc.*)

¹³ CDC National Environmental Public Health Tracking Network data Health Effects categories can be located here: <https://ephracking.cdc.gov/showHealthEffects.action>

- Homelessness (*e.g. prevalence of persons affected by homelessness in the community, number of shelters, etc.*)

The Working Group also recommends the following formats and items also be expressly allowed for submission to support proposals:

- Testimony or Personal Narratives
- Multi-Media Documentation (*e.g. photographs, videos, or other multimedia documenting qualitative factors*)
- Media Coverage – *please provide any relevant media coverage of events or experiences you deem relevant*
- Previous Funding Proposals – *please provide available examples of previous proposals by any groups or individuals related to environmental justice in the community*

Additionally, the Working Group recommends that data gathered through “ground truthing” and site visits as referenced in the response to Question 3 could complement the initial submission of qualitative and quantitative data and should be considered in proposal review.

6. What time constraints should be applied to the supporting data?

6a. Should this be different for quantitative vs. qualitative factors?

The Working Group recommends that supporting data not be subject to time constraints. The Working Group recognizes that a singular time constraint on either quantitative data, qualitative factors, or both categories, would not be able to be set for the entire process without potentially eliminating key pieces of information that could support a self-designator’s proposal. There are some communities in the state where historic patterns of inequity and environmental injustice resulting from events in the past, including legacy industrial activities 20+ years ago, are still consequential for community residents today. Each community’s unique situation necessitates an evaluation of the data as it is submitted within their proposal instead of placing a limitation on the age of potentially relevant information up front. Additionally, as quantitative databases all have different update cycles based on different regulatory practices and timelines, a single time constraint on such types of data is not recommended.

7. Are the minimum submission requirements reasonable?

The Working Group agrees that minimum submission requirements should include qualitative pieces of information supporting self-designation proposals. The Working Group also supports the concept of graduated requirements put forward in the proposal, particularly where self-designation of areas that are already demonstrated to contain block groups already designated as environmental justice communities have to meet a lower threshold for the quantity of supporting factors provided.

However, the Working Group does not recommend any minimum requirement be assigned to quantitative data supporting self-designation proposals. In keeping with the Working Group’s “Removal of Quantitative Minimums and Averages” recommendation in the response to Question 3 on the acceptability of the approach and “Removal of Average Level Demonstration” in the response to Question 5 on additional factors to expressly include in the process, the Working Group recommends that the Administrator entirely remove the two requirements included that currently read as follows on page 1 of the Self-Designation Process Proposal document with removal indicated through strikethrough:

~~“The community Designator must demonstrate that the community is subject to higher than average impacts from each of a minimum of two quantitative factors”~~

~~“The community Designator must demonstrate that the community is subject to higher than average impacts from each of a minimum of four quantitative factors”~~

As stated previously in the “Removal of Quantitative Minimums and Averages” recommendation response to Question 3, requiring quantitative minimums may create unfair disadvantages for self-designators with fewer resources. The Working Group reemphasizes that low-income communities with a history of environmental exposures and social and economic vulnerability face immense challenges in a) accessing the kinds of quantitative data that may reflect their experiences or consequential impacts from industrial site(s) or events and b) procuring the kinds of capacity required to access and process the data when it is available for the purposes of submission in a proposal. A more flexible approach, which considers the totality of quantitative or qualitative information presented, is recommended.

8. Are there additional tools that will be needed by participants, Approved Vendors, Communities, or others to access Environmental Community designation information?

The Working Group supports the initial list of tools proposed by the Administrator, including:

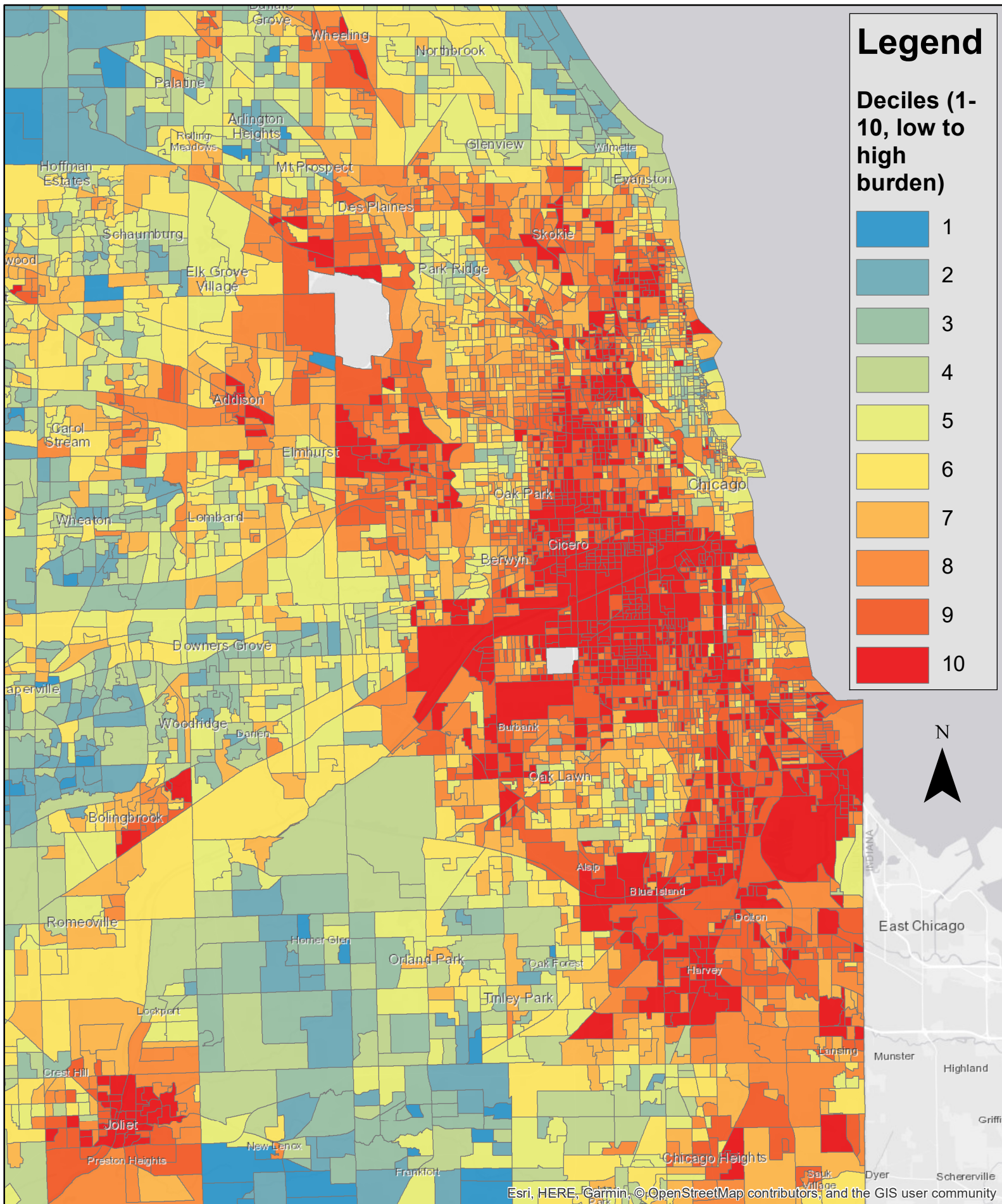
- “Address look-up tool for Approved Vendors and the public to use in determining whether a household or project site falls within a designated EJ Community
- Statewide map(s) to view designated EJ census block groups
- Administrator will be tracking projects & participants from EJ Communities to determine progress toward 25% goal”

The Working Group recommends the following tools that would assist participants, Approved Vendors, communities, and others in accessing designation information:

- Maps of key municipalities, rural areas, and regions of the state to ensure detailed images are available for all portions of the state – in addition to provision of a state look-up tool and subsequent maps, image snapshots of subsections of the maps that could be printed out or studied would be helpful.
- Interactive mapping tool that includes the ability to see the 25% percentage information, the decile ranking information referenced in the Working Group’s recommendations to Question 2, and a map layer that demonstrates both decile and the 25% percentage. As noted in the prior response to Question 2, one example of the multiple ways this could be done as determined by the Administrator, a map could include cross-hatching or other graphic overlay along with a color scale to demonstrate both characterizations in the same image.
- Google Earth and GIS map files (including shapefiles) containing information used in the program.
- Self-Designation Proposal Question Tool – A document that lists the requirements for submission of self-designation proposals in question format to aid communities in discussion and working through whether or not submitting a proposal aligns with interest and capacity.
- Tracking Data Summaries on progress toward 25% goal such that members of the public, communities, and Approved Vendors can get access to progress information on a frequent basis, as much as monthly or as infrequently as quarterly – specific data included could be determined through the Third Party Evaluation process.

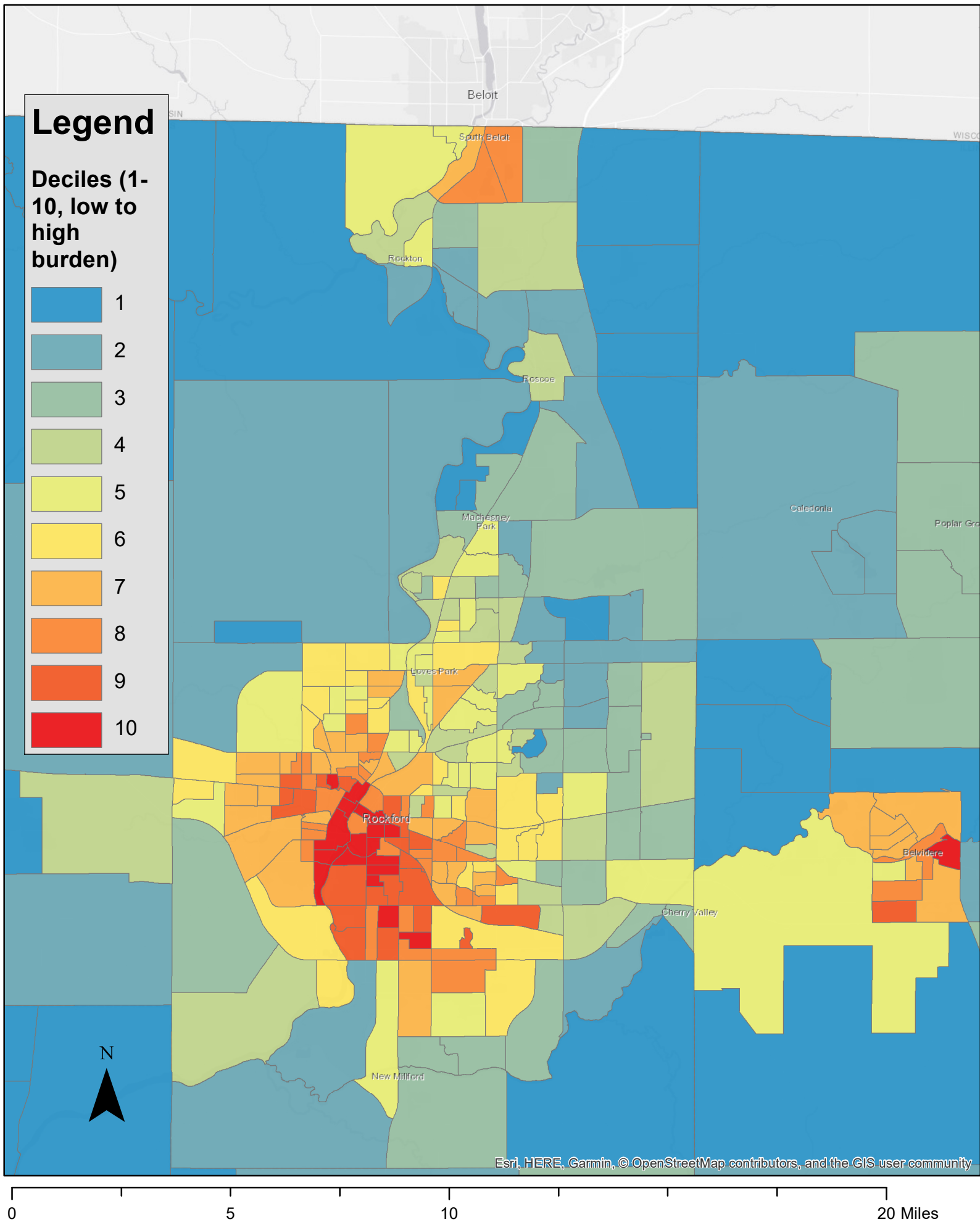
With respect to an address look-up function, the Working Group considers it important that this function be accompanied by non-technical language to aid comprehension of the results. Specifically, it is important for people to understand that the data used to calculate EJ scores are area-level estimates, and should not be interpreted as specific measured values at a given address or location.

Illinois Solar for All - EJ Score Deciles - Chicago



0 5 10 20 Miles

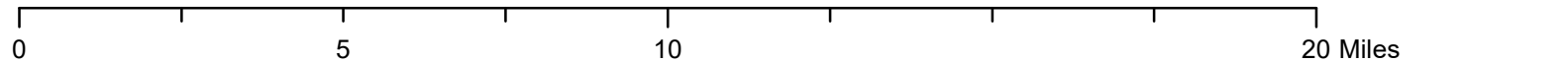
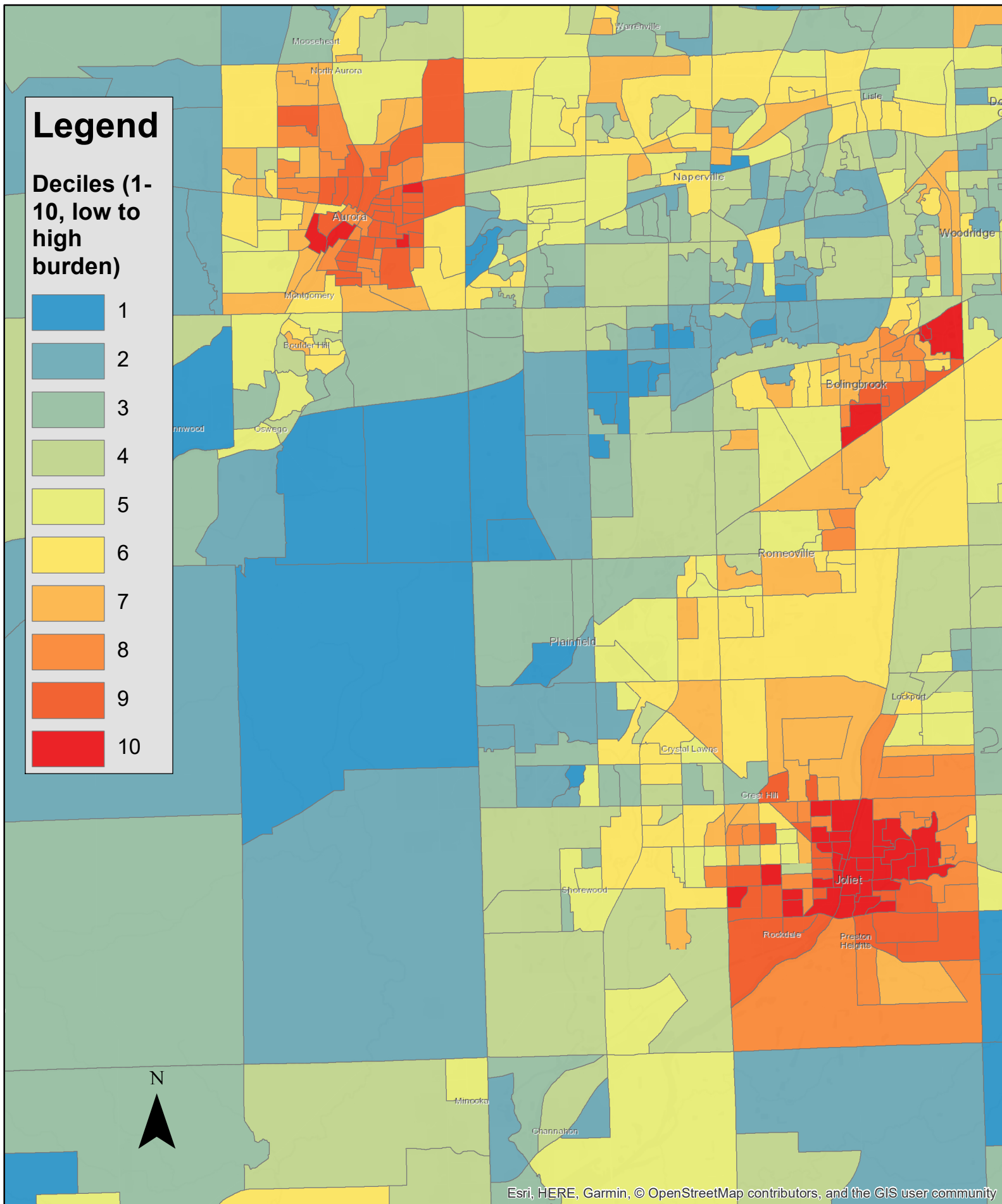
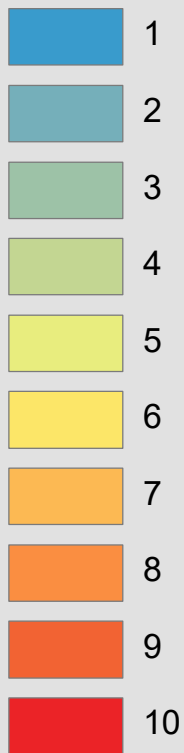
Illinois Solar for All - EJ Score Deciles - Rockford



Illinois Solar for All - EJ Score Deciles - Joliet, Aurora, Naperville

Legend

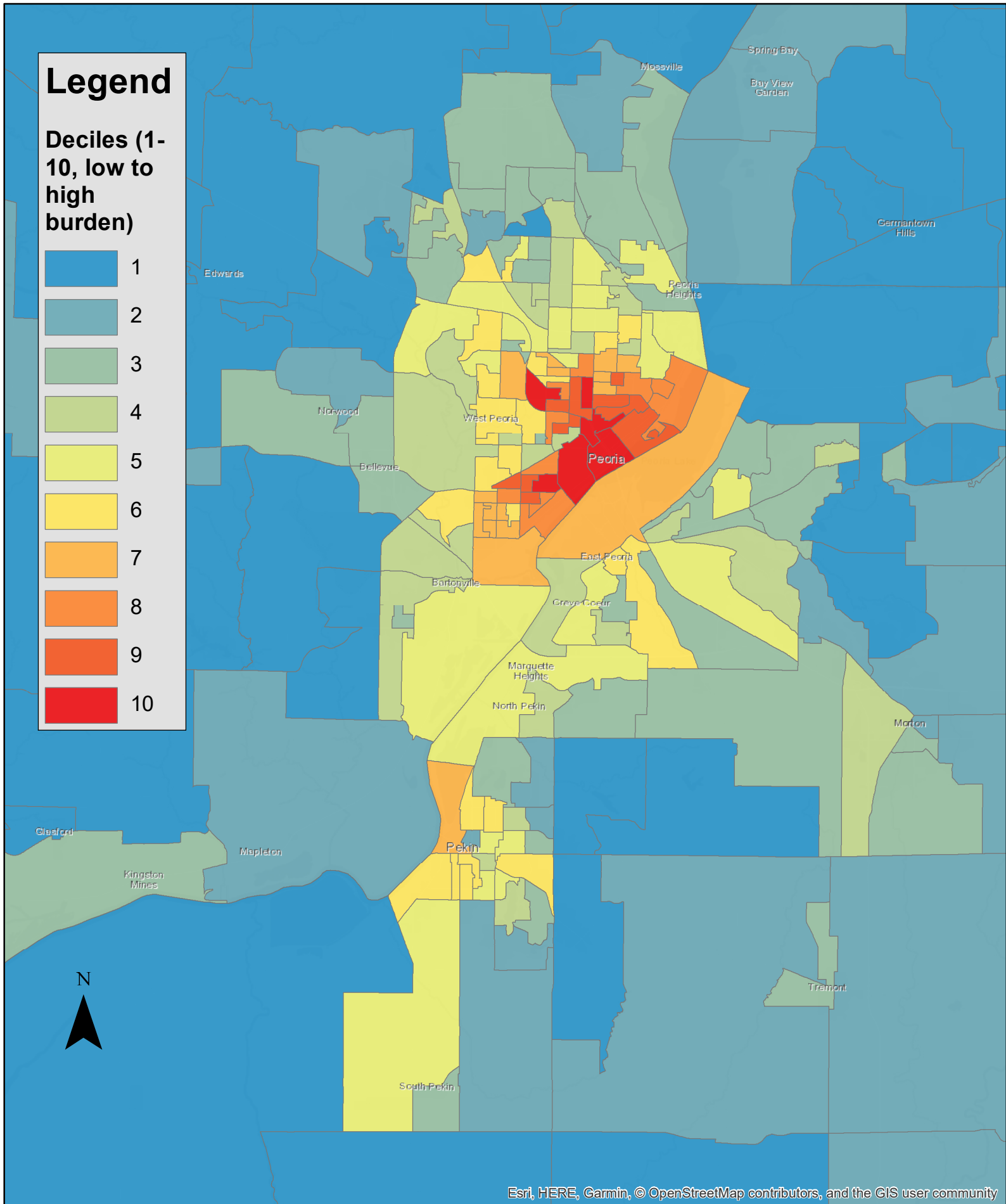
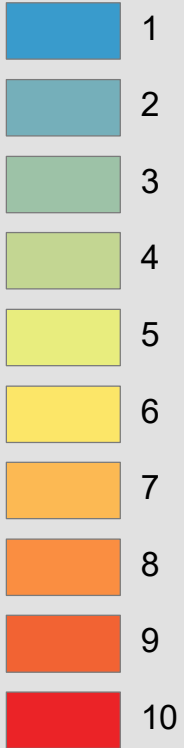
Deciles (1-10, low to high burden)



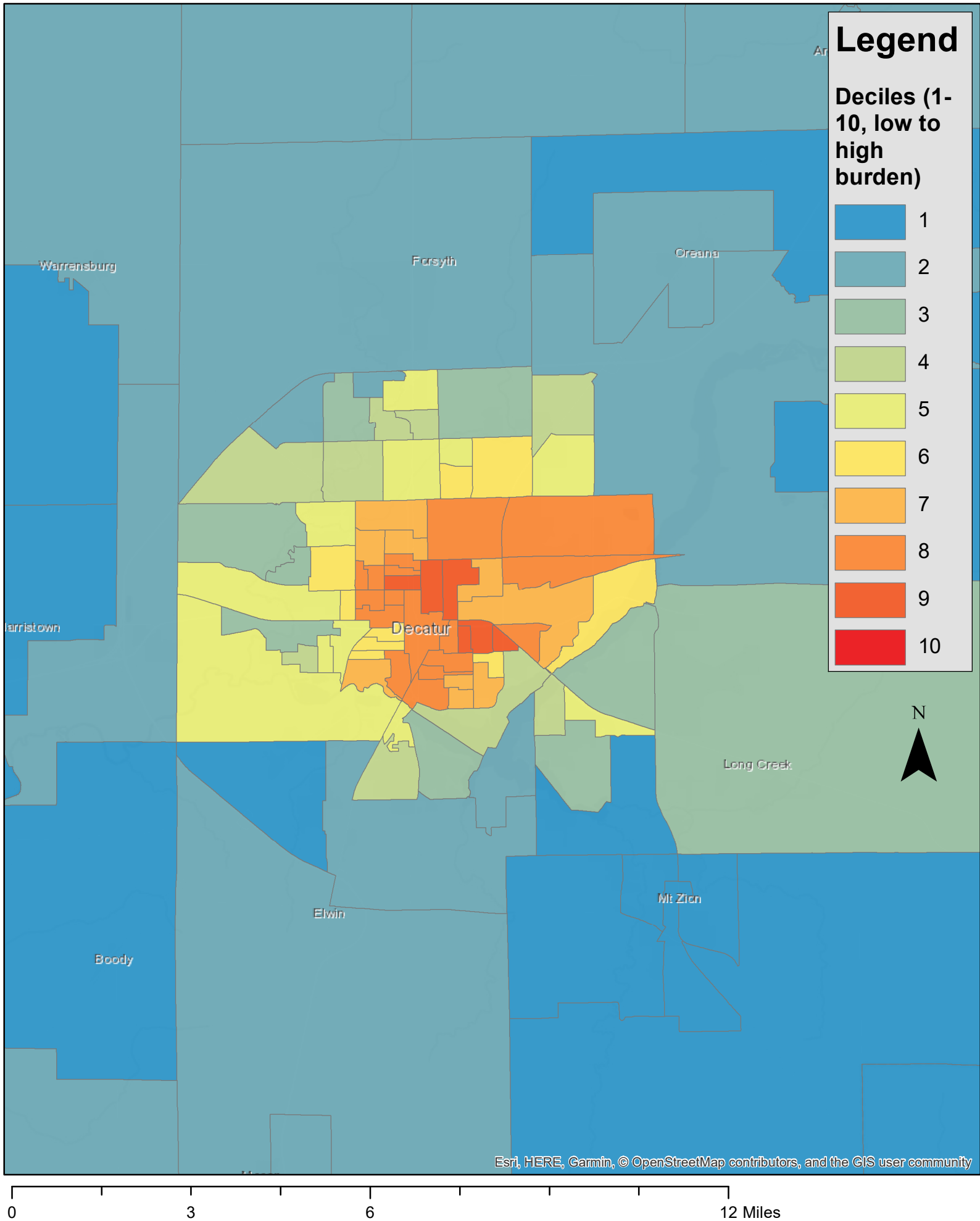
Illinois Solar for All - EJ Score Deciles - Peoria

Legend

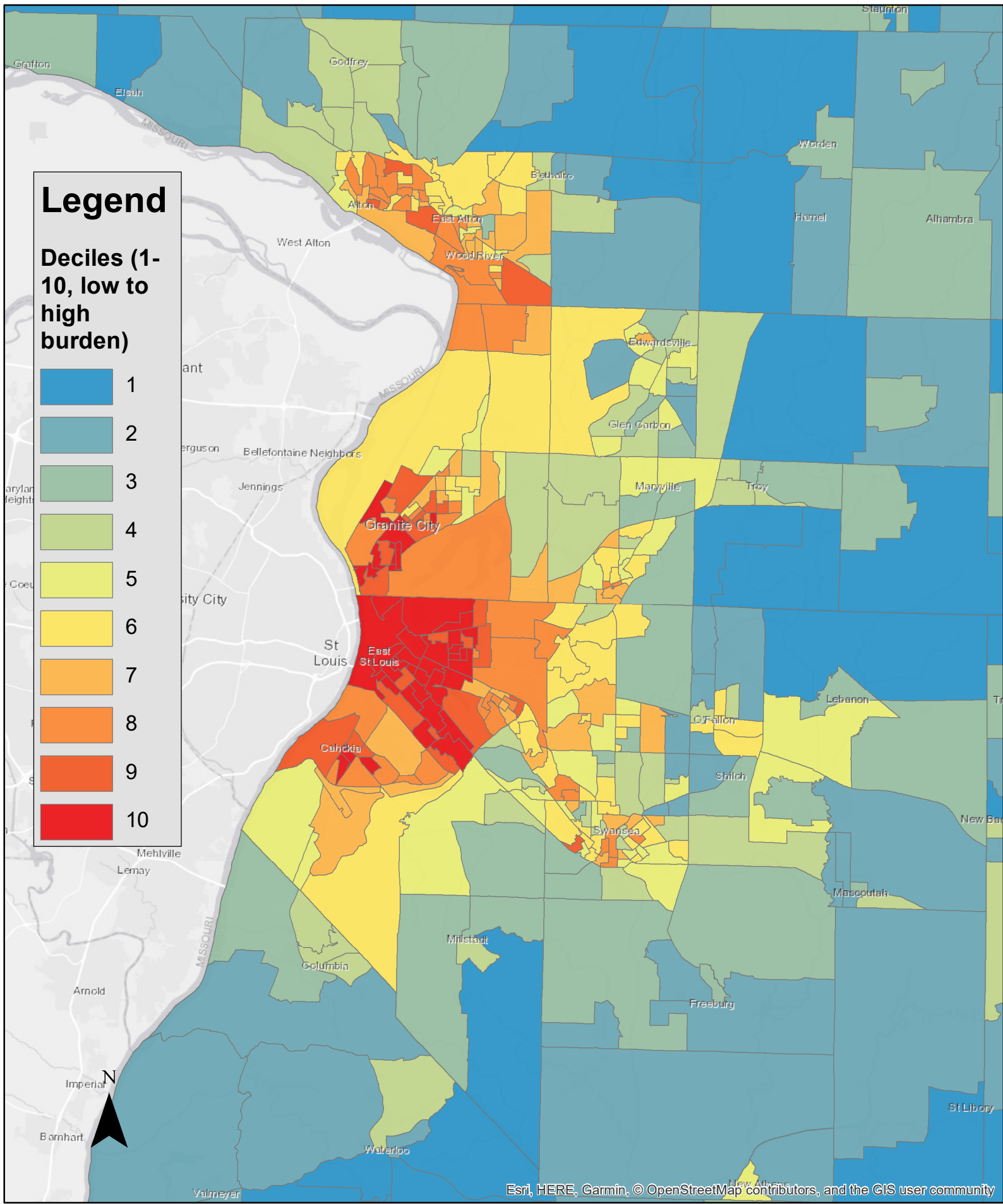
Deciles (1-10, low to high burden)



Illinois Solar for All - EJ Score Deciles - Decatur



Illinois Solar for All - EJ Score Deciles - East St. Louis



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