

04.22.2019

Environmental Justice Community Self-Designation Process

Elevate Energy, in its capacity as Program Administrator, will convene an Environmental Justice (“EJ”) Community Self-Designation Committee to evaluate self-designation proposals submitted via this process. The Committee will be comprised of 6-8 members (3-4 representatives from Elevate Energy, 1-2 from the IPA, and 2 Environmental Justice experts). The Committee will review proposals and make the final determination as to whether the community in question is designated as an Environmental Justice Community.

Designators responsible for facilitating their community’s self-designation proposal will be asked to define their community based on relevant, localized geographic boundaries (e.g. streets, rural highways, county lines). However, the practical result of the self-designation process will be that additional Census Block Groups within that self-defined community receive the Environmental Justice Community designation. This level of granularity in the designation will enable the Program Administrator to ensure consistency in how it tracks and measures participation from these communities, as well as how Approved Vendors and potential participants are able to use tools (e.g. maps and address look-ups) to determine if they are located within a designated Environmental Justice Community.

In practice, the Designator will complete a two-part form to request that a community be designated as an EJ Community. The committee will then use a rubric to assess the quantitative and qualitative data submitted. This rubric mirrors the types of data that entered the original calculation for the EJ Score, covering four areas of environmental justice characteristics: Exposure Indicators, Environmental Effects Indicators, Sensitive Population Indicators, and Socioeconomic Factor Indicators. Within each of the four EJ areas, a score will be assigned based on the extent of burden experienced by the community (e.g. none, little, some, a great deal, most). The level of burden will be deemed higher if supporting documents indicate that:

Exposure Indicators- The exposure level is greater than deemed safe.

Environmental Effects- Proximity to environmental hazards is close.

Sensitive Population Indicators- The number, or percentage, of at-risk community members is high.

Socioeconomic Factor Indicators- The number, or percentage, of at-risk community members is high.

Communities must receive a minimum score of 45 (out of 60 possible points) and receive points from both components of the EJ Score (exposure and environmental,

sensitive and socioeconomic) to be designated as an EJ Community. The possible points are: 20 for Exposure Indicators; 10 for Environmental Effects Indicators; 15 for Sensitive Population Indicators; and 15 for Socioeconomic Factor Indicators. In addition to scores for the four EJ areas, an additional 10 points is available to communities who are directly adjacent to a calculated EJ block group. In scoring, the committee will give the application an integer score from 0 to 4 in each of the four environmental justice areas; these scores will then be translated to rubric points based on the relative weighting of each rubric area. (For example, if the committee assesses the information submitted to support the Exposure Indicators as a 2, that application will receive 50% of the 20 available points for Exposure Indicators, i.e. 10 points. If the application receives a score of 1 in the Sensitive Population area, it will receive 25% of the 15 available points for Sensitive Population, i.e. 3.75 points.)

Environmental Justice Rubric	Points						Total	
Proximity to EJ Block Group	0/10	10 points= Adjacent to EJSCREEN Block Group 0 points= Not adjacent						
		No burden assessed	Little burden assessed	Some burden	Much burden	Great deal of burden		
		0	1	2	3	4		
Exposure Indicators: Based on measurements of different types of pollution that people may face.	20							
Environmental Effects Indicators: Base on the locations of toxic chemicals in or near communities.	10							
Subtotal							0	
Sensitive Population Indicators: Measure the number of people in a community who may be more severely affected by pollutions because of their age or health.	15							
Socioeconomic Factor Indicators: Conditions that may increase people's stress or make healthy living difficult and cause them to be more sensitive to pollution's effects.	15							
Subtotal							0	
Total							0	

Applications will be reviewed every 14 days by the EJ Community Self-Designation Committee, starting April XX, and any response or request for more information will be communicated to the applicant within 4 business days. The Environmental Justice page on the ILSFA website will be updated with new EJ Community designations no later than one week after a decision has been made. The searchable map will be updated bimonthly for the first three months of a program year and then monthly thereafter.

Environmental Justice Self-Designation Form <to be web-based>

Part A: Basic Information

1. Name of Designator
2. Designator affiliation
3. Designator contact information
 - a. Email
 - b. Phone number
4. Additional organizations/individuals supporting Designator
 - a. Letters of support from additional organizations or individuals may be provided, but are not required to complete the process
5. Name of community proposed for designation
6. Geographic limits of proposed community
 - a. Street boundaries, rural highways, county lines, or similar
7. List the Census Block Groups within proposed community limits
 - a. Use the Environmental Justice Map as a guide

Please provide a brief explanation of why you believe the territory you have identified is a cohesive community for the purposes of receiving an Environmental Justice Community designation under Illinois Solar for All. Your answer may draw from history, culture, economics, geography, or other considerations you deem relevant. (maximum 500 words)

Open text response

Part B: Quantitative & Qualitative Support

Please provide a narrative that includes supporting data to demonstrate a disproportionate environmental, health, or socioeconomic burden experienced by your community. We encourage you to provide both quantitative and qualitative support when possible. If you

would like confidential treatment of the information submitted, please indicate so in the narrative. (maximum 1,000 words plus attached documents)

Open text response & ability to add attachments.

Further Guidance on Supporting Data

Note that several factors, listed [here](#), have already been accounted for through the initial Environmental Justice analysis; those 17 variables are taken from the U.S. EPA's EJSCREEN tool. The sample list of environmental indicators below is intended to be representative of the pollutant types that a community may face.

- [Drinking Water Watch](#) – identify elevated lead levels in community drinking water
- [Site Remediation Program](#) – determine whether participating sites exist within the community
- [Leaking Underground Storage Tank Incident Tracking](#) – view locations and statuses of any sites within the community
- [State Response Action Program](#) – view locations and statuses of all sites
- [Solid Waste Facilities](#) – identify facilities within the community
- [Birth Characteristics](#) – view county level statistics for low birthweight infants
- [500 Cities Asthma and COPD Prevalence](#) – view health outcomes for selected Illinois cities
- [HUD Rental and Housing Assistance Data](#) – view data on assisted housing and subsidies
- [CDC National Environmental Health Resources](#) – browse major data systems where public health and environmental data is available
- Citizen Science - scientific work undertaken by the public, often in collaboration with professional scientists and scientific institutions

The IPA and the Illinois Solar for All Program Administrator recognize that all data points may not be available in all instances, nor does it always represent the full picture of a community's unique experiences that may qualify it as an Environmental Justice Community. To account for this, we have identified several qualitative factors that can be considered in this self-designation process.

For responses that cite a specific incident, please include the year in which the incident occurred, as well as an explanation of how your community was more greatly impacted than a comparable geography¹.

Qualitative indication of Environmental Justice Community designation need might include:

- Historical events (e.g. fire, housing crisis)
- Environmental disasters and/or severe weather events
- Plant (e.g. manufacturing, fossil generation) openings/closures/operations
- Economics (e.g. 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 access to fresh food, limited access to infrastructure, mass incarceration levels, criminal justice, access to affordable and public housing, and homelessness rates)

Additionally, the form that that quantitative or qualitative support can take is varied and may include items such as:

- Summary tables or values from an existing database
- Reports compiled through citizen science
- Expert testimony written specifically for the submission
 - For example, a local pediatrician who says that there is an unusually high number of respiratory illness
- News articles demonstrating common knowledge of a local problem
 - For example, <https://stlrecord.com/stories/511445351-motion-for-21-5-million-settlement-against-monsanto-approved>
- Evidence of community organizing around an issue through strikes, demonstrations, or other forms of public action

The examples provided are not meant to represent all possible forms of support in the self-designation submission, and designators are encouraged to include any quantitative or qualitative information that they feel is appropriate to the scoring rubric.

¹ Can be compared to the state as a whole, surrounding communities, metropolitan areas, or other geographies as deemed most appropriate for the scale of the incident.