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Environmental Justice Communities Self-Designation Process

Environmental Justice Self-Designation

Identifying Environmental Justice Communities (EJCs) is important for Illinois Solar for All because a quarter of all program incentives are targeted to projects that are in or serving Environmental Justice Communities. One goal of the Illinois Solar for All program is to allocate 25% of funding toward Environmental Justice Communities.

EJCs are identified through calculations based on available data. Communities not identified as EJCs through that methodology but believe that they should be eligible due to exposure, environmental effects, sensitive populations, and/or socioeconomic conditions can request consideration through the self-designation process.

Community Self-Designation Committee

The Illinois Solar for All (ILSFA) Program Administrator, will convene an Environmental Justice Community Self-Designation Committee (the “Committee”) to evaluate self-designation proposals submitted via the process described below. The Committee will be comprised of six to eight members (three to four representatives from ILSFA, one to two from the Illinois Power Agency (IPA or the Agency), and two Environmental Justice experts). Environmental Justice experts are those with extensive knowledge and experience in the field of environmental justice. They are typically responsible for providing guidance and advice on environmental justice issues to organizations, government agencies, and other stakeholders. They may also conduct research, develop policies, and provide training to promote environmental justice.¹ The Committee will review proposals and make the final determination as to whether the community in question is designated as an Environmental Justice Community. Committee members will serve for staggered two-year terms. Interested parties may apply to join the Committee. The application process will be publicized on the ILSFA website. Near the end of a member’s term, they may apply for renewal to serve another two-year term. The renewal selection process will be based on the member’s participation record (their attendance at meetings and submission of scores). The selection and renewal of members will be determined by sitting Committee members, the Program Administrator, and the IPA. No member may serve more than six years.

Self-Designation Requirements

The IPA states in the [2024 Long-Term Renewable Resources Procurement Plan](#) (the Plan) that the Agency will consider requests from community-based organizations, local units of government, or community residents for self-designation as an environmental justice community based on demonstrated quantitative and qualitative environmental and/or socioeconomic factors that show a disproportionate burden and were not adequately captured in the screening defined above.

¹ Note: Committee members will not be compensated.

The individual(s) responsible for facilitating their community’s self-designation proposal (the “Designator”) 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. It also allows Approved Vendors and potential participants to use the same tools (e.g., maps and address look-ups) to determine if they are located within an Environmental Justice Community (calculated or self-designated).

In practice, the Designator will complete a two-part form to request that a community be designated as an Environmental Justice Community. The Committee will then use a rubric (evaluation guidelines) to assess the quantitative and qualitative data submitted. This rubric addresses four areas of environmental justice characteristics:

1. Exposure Indicators
2. Environmental Effects Indicators
3. Sensitive Population Indicators, and
4. Socioeconomic Factor Indicators.

Within each of the four Environmental Justice 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:

1. Exposure Indicators- The exposure level is greater than deemed safe.
2. Environmental Effects Indicators- Proximity to environmental hazards.
3. Sensitive Population Indicators- The number, or percentage, of at-risk community members is high.
4. Socioeconomic Factor Indicators- The number, or percentage, of effected community members is high.

The scoring rubric gives further context into the various levels of burden.

	No Burden -	Little Burden -	Some Burden -	Much Burden -	Great Deal of Burden -
Exposure	application does not mention exposure indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities

Environmental Effects	application does not mention environmental effects indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities
Sensitive Population	application does not mention sensitive population indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities
Socioeconomic Factor	application does not mention socioeconomic factor indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities

Communities must receive a minimum score of 45 (out of 70 possible points), to be designated as an Environmental Justice Community. The possible points are:

Maximum Points	Environmental Justice Score Component
20	Exposure Indicators
10	Environmental Effects Indicators
15	Sensitive Population Indicators
15	Socioeconomic Factor Indicators

In addition to scores for the four Environmental Justice areas, an additional 10 points are available to communities that are directly adjacent to a calculated or self-designated Environmental Justice block group ("Proximity Points"). In scoring, the Committee will give the application an integer score in each of the four Environmental Justice areas; these scores will then be added together to arrive at the total score. (For example, if the Committee assesses the information submitted to support the Exposure Indicators as "Much Burden", that application will receive 15 of the 20 available points for Exposure Indicators. If the Committee assesses the information submitted to support the Sensitive Population Indicators as "Some Burden", that application will receive 8 of the 15 available points for Sensitive Population Indicators).

This table shows examples of how various indicators could be scored:

	EXAMPLE	No Burden - 0	Little Burden - 1	Some Burden - 2	Much Burden - 3	Great Deal of Burden - 4
Exposure	Radon	application does not mention issues with radon	application mentions issues with radon	radon measurements for area are higher than for the associated county	radon measurements for area are over 1.5 times the measurement for the associated county	radon measurements for area are over 2 times the measurement for the associated county
Environmental Effects	Solid Waste Facilities	application does not mention solid waste facilities	application indicates area has at least 1 solid waste facility	area has at least 1 solid waste facility and details how the community is impacted	area has multiple solid waste facilities	area has multiple solid waste facilities and application details how the community is impacted
Sensitive Population	Birth Characteristics (as defined in Supporting Information section)	application does not mention birth characteristics	application mentions at least one birth characteristic	at least one birth characteristic demonstrates a percentage that is higher than the State average	at least two birth characteristics demonstrate percentages that are higher than the State average	at least one birth characteristic demonstrates a percentage that is in the State's 90th percentile
Socioeconomic Factor	HUD Rental & Housing Assistance	application does not mention HUD rental or housing assistance	application mentions HUD rental or housing assistance (number of months since moved in)	application mentions HUD rental or housing assistance (number of months since moved in) is greater than the State average	application mentions HUD rental or housing assistance (number of months since moved in) is at least 1.5 times the State average	application mentions HUD rental or housing assistance (number of months since moved in) is at least 2 times the State average

	No Burden	Little Burden	Some Burden	Much Burden	Great Deal of Burden
Exposure	application does not mention exposure indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities
POINTS	0	5	10	15	20
Environmental Effects	application does not mention environmental effects indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities
POINTS	0	3	5	8	10

Sensitive Population	application does not mention sensitive population indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities
POINTS	0	4	8	12	15
Socioeconomic Factor	application does not mention socioeconomic factor indicators	application mentions at least one indicator, but provides no support	application supports one type of indicator and that it impacts community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a greater extent than other communities	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities
POINTS	0	4	8	12	15

The Committee is scheduled to meet twice a month to review applications that have been submitted at least five business days before the scheduled meeting date. If the application appears incomplete or there are initial questions regarding the application, the Committee may ask for clarification from the Designator prior to completing the Committee’s determination. Any response or request for more information will be communicated to the applicant within two weeks of the Committee’s determination. If the Committee determines that the community will not be considered a Self-Designated Environmental Justice Community, the Committee will offer a feedback session to explain their determination to the Designator.

The ILSFA website's searchable Environmental Justice Community map will be updated within two weeks of the Committee approving a designation request.

The Application

Below is a summary of the Environmental Justice Community Self-Designation Application Form. Actual examples of applications from other entities that have been approved as Self-Designated Environmental Justice Communities are also available for review.

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 information 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.

Supporting Information

FURTHER GUIDANCE ON SUPPORTING DATA

Note that several factors have already been accounted for through the initial Environmental Justice analysis; those 17 variables (listed below) are taken from the U.S. [EPA's EJSCREEN tool](#). There is no need to resubmit EJSCREEN data, but the applicant may choose to provide additional information on these variables keeping in mind the EJSCREEN data has already been considered.

Particulate Matter levels in air annual avg. (2012)

Particulate matter refers to a mixture of solid particles and liquid droplets found in the air. These particles can be harmful and can vary in size, shape, and chemical composition and can include substances like dust, dirt, soot, and smoke.

Ozone summer seasonal avg. of daily maximum 8-hour concentration in air in parts per billion (2012)

Ozone can be harmful to human health, especially when it is present at ground level. Ozone is a powerful oxidant that can irritate the airways and has a range of health effects. The average ozone levels during the summer season, particularly from May to September, are influenced by weather conditions such as temperature and sunlight.

Diesel particulate matter level in air

Diesel particulate matter is a component of diesel exhaust that consists of tiny particles. These particles can be harmful to human health, as they are small enough to be inhaled deeply into the lungs and may carry

<i>carcinogenic compounds. The levels in the air can vary based on several factors, including traffic density and industrial activities.</i>
Lifetime cancer risk from inhalation of air toxics
Air toxics respiratory hazard index (ratio of exposure concentration to health-based reference concentration)
Count of vehicles (avg. annual daily traffic) at major roads within 500 meters
Percent of housing units built pre-1960, as indicator of potential lead paint exposure
Count of proposed and listed hazardous waste sites (from EPA's National Priorities List) within 5 km (or nearest one beyond 5 km)
Count of Potential Chemical Accident facilities (from EPA's Risk Management Plan) within 5 km (or nearest one beyond 5 km)
Count of hazardous waste management facilities (from EPA's Treatment, Storage, Disposal Facilities list) within 5 km (or nearest beyond 5 km)
Toxicity-weighted stream concentrations at stream segments within 500 meters <i>Toxicity-weighted stream concentrations are a measurement used to evaluate the potential impact of chemical releases into waterways. It reflects the amount of the chemical and the strength of the chemical, to indicate the potential environmental and health risks.</i>
Percent of individuals in a block group who list their racial status as a race other than white alone and/or list their ethnicity as Hispanic or Latino (all people other than non-Hispanic white-alone individuals)
Percent of a block group's population in households where the household income is less than or equal to twice the Federal Poverty Level
Number or percent of people in a block group living in linguistically isolated households (<i>a household in which all members age 14 years and over speak a non English language and also speak English less than "very well" or have difficulty with English is considered linguistically isolated</i>)
Number or percent of people age 25 or older in a block group whose education is short of a high school diploma
Number or percent of people in a block group under the age of 5
Number or percent of people in a block group over the age of 64

The following sample list of indicators is intended to be representative of the conditions that a community may face and can be used in the self-designation application to help demonstrate the disproportionate burden not adequately captured by the EJSCREEN tool.

EXPOSURE INDICATORS

- [Drinking Water Watch](#) – identify elevated lead levels in community drinking water
This tool provides various water quality information and allows the user to search by County then City then water system. The glossary and index on the site help the user interpret the data.
- [Radon in Illinois](#) – view radon level measurement data reported by licensed measurement and mitigation professionals
This tool provides measurement data by County and Zip code.

ENVIRONMENTAL EFFECTS INDICATORS

- [Site Remediation Program](#) – determine whether participating sites exist within the community
This site allows the user to search for Illinois EPA remediation sites filtered by County, City, Zip Code, Street Name, Site Name and/or IEPA ID Number.
- [Leaking Underground Storage Tank Incident Tracking](#) – view locations and statuses of any sites within the community
This site allows the user to search the database on leaking underground storage tank incidents filtered by County, City, Zip Code, Street Name, Site Name and many other parameters including the type of fuel leak.
- [State Response Action Program](#) – view locations and statuses of all sites
This IEPA site allows the user to search for various environmental clean-up projects including oil spills and hazardous chemicals, by ID number, Site Name, Address, City, County or Region.
- [Solid Waste Facilities](#) – identify facilities within the community
This site allows the user to search for applications submitted, or permits issued by the IEPA. The IEPA issues permits for the management of non-hazardous waste at landfills, transfer stations, compost, and waste storage, treatment, processing, and recovery facilities.

SENSITIVE POPULATION INDICATORS

- [Birth Characteristics](#) – view county level statistics for low birthweight infants
This site of the Illinois Department of Public Health provides the user with preterm, low birthweight and very low birthweight statistics as well as other birth-related categories.
- [500 Cities Asthma Among Adults over 18](#) – view health outcomes for selected Illinois cities
This site of the Center for Disease Control and Prevention provides the % of adults over the age of 18 diagnosed with Asthma by City.
- [CDC National Environmental Health Resources](#) – browse major data systems where public health and environmental data is available
This CDC site allows the user to search data on many categories including birth defects, pesticide exposure, heart disease and cancer.

SOCIOECONOMIC FACTOR INDICATORS

- [HUD Rental and Housing Assistance Data](#) – view data on assisted housing and subsidies
This site of the US Department of Housing and Urban Development (HUD) provides the user with housing related data including the number of Public Housing units and the number of Section 8 units as well as demographic data.
- [Current Monthly Unemployment Rates \(illinois.gov\)](#) – view data of monthly unemployment statistics
This site includes current, previous and year ago monthly unemployment rates for State, Metropolitan Areas, Counties, Cities, Micropolitan Areas, Combined Areas, Local Workforce Areas and Economic Development Regions.

The IPA and the ILSFA Program Administrator recognize that all data points may not be available in all instances, nor does data 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 geography².

Qualitative indications 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, 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, [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.

² 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.

Conclusion

The Environmental Justice Community Self-Designation process is intended to allow community-based organizations, local units of government, and community residents the opportunity to share information about their communities in order to be noted as an environmental justice community for purposes of the Illinois Solar for All program. By sharing demonstrated quantitative and qualitative exposure, environmental, sensitive population and/or socioeconomic information, the submitter can apply for consideration. To become an Environmental Justice Community through self-designation a community must show a disproportionate burden that was not adequately captured in the Environmental Justice calculation process.

Questions about the Environmental Justice Community Self-Designation process can be directed to info@illinoisSFA.com.