

# Response to Comments: Environmental Justice Communities Self-Designation Process

## Overview

The Illinois Solar for All Program Team has reviewed the feedback from stakeholders and other interested parties on the proposed changes to the Environmental Justice Communities Self-Designation Process for the 2024-2025 Program Year.

A request for feedback on the proposed changes to the Environmental Justice Communities Self-Designation Process was issued on April 24, 2024, with public comments due on May 8, 2024. Two parties submitted [written comments](#). The Program Team has considered these written comments and appreciates the thoughtful input provided by the commenter. Comments have been summarized and addressed below.

# Stakeholder Comments and Responses

## FEEDBACK #1:

*The Illinois Solar for All Program Team proposes that Environmental Justice (EJ) Community Self-Designation committee members serve renewable, staggered 2-year terms and no more than a total of 6 years. The Illinois Solar for All Program Team further proposes that the sitting committee members, the Program Manager, and the Illinois Power Agency determine the selection and renewal of members.*

Our organizations believe it is important to diversify our committee to ensure new ideas and issues are considered while allowing the members enough time to grow into their positions and provide effective leadership. We applaud your efforts in this initiative.

## RESPONSE #1:

The Illinois Solar for All Program Administrator appreciates the feedback.

## FEEDBACK #2:

*More detail is provided in the scoring rubric, and examples are given to help the reader understand how their application may be scored.*

Transparency is vital to build trust and capacity within disadvantaged communities. It is already difficult to ask the most vulnerable to provide validation for their need for assistance and resources. Using multipliers and complex scoring systems muddy the waters and create barriers to successful applications. This flaw is exacerbated by the fact that feedback on applications is not mandatory and leaves the denied applicant with few resources to improve their application.

While our organizations agree with using examples and a scoring rubric, the forms and rubrics must match numerical scores. It is confusing when each section is scored and individually weighted for a total score. A simplified scoring system would allow applicants to understand better where they should prioritize their time and allow them to essentially grade their applications before submitting them.

In addition, the multiplier reduces the point range for each category in ways that are detrimental to the applicants and their communities. In a 20-point category, the actual points that can be awarded are 0, 5, 10, 15, and 20, with no other options in between. For a 15-point category, the options are 0, 3.75, 7.5, 11.25, or 15, and for a 10-point category, 0, 2.5, 5, 7.5, and 10. The scoring would be more transparent by actually using the full points range for each category with the current multipliers as guidelines but allowing for 40% and 60% scores to be given.

**RESPONSE #2 :**

While feedback on applications is not mandatory, all denied applicants are offered a feedback session. In most cases, the applicant accepts the offer. The feedback session includes discussion and exchange of ideas regarding how to strengthen the application.

Regarding the scoring rubric, the Program Administrator is proposing a revised scoring system that simplifies the process. Defined points are provided to capture the level of burden for each indicator.

	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
<b>POINTS</b>	<b>0</b>	<b>5</b>	<b>10</b>	<b>15</b>	<b>20</b>
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
<b>POINTS</b>	<b>0</b>	<b>3</b>	<b>5</b>	<b>8</b>	<b>10</b>
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	data supports more than one type of indicator and that they impact the community to a greater extent than other	data supports more than one type of indicator and that they impact the community to a much greater extent than other communities

			other communities	communities	
<b>POINTS</b>	<b>0</b>	<b>4</b>	<b>8</b>	<b>12</b>	<b>15</b>
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
<b>POINTS</b>	<b>0</b>	<b>4</b>	<b>8</b>	<b>12</b>	<b>15</b>

**FEEDBACK #3 :**

Our organizations have found that using different maps can be overwhelming and confusing to citizens unfamiliar with these programs.

We are working on informational pages to help explain the difference between commonly used applications such as the EJ Screen & the CEJEST Tool.

While ALL of these maps can be useful, it would be helpful to understand that just because a community is not considered “disadvantaged” on one map does **not** mean it will not be included in another dataset. Creating capacity and understanding around the online tools and resources available to communities will create transparency and trust within the system.

We believe this is an area where your team could provide educational materials or links on the website to help community members understand the diverse use of datasets.

**RESPONSE #3 :**

The Program Administrator agrees that including additional mapping sources can be overwhelming. Until additional educational materials can be created to assist the user in navigating the additional maps, they will be removed from the process document.

**FEEDBACK #4 :**

Using acronyms, technical terms, and codes can be a large hurdle for community members to overcome. Even spending the extra time to Google what something means can be discouraging and lead to slower or incomplete application submissions.

We recommend your team consider using appropriate language for **ALL** levels of capacity and understanding.

**RESPONSE #4 :**

The Program Administrator believes many of the acronyms and technical terms are found in the list of Supporting Information. Definitions have been added where appropriate.

**FEEDBACK #5 :**

Several links are broken on the Self-Designation application form website ([www.illinoissfa.com/designate-your-community/](http://www.illinoissfa.com/designate-your-community/)).

The broken links include

- State Response Action Program
- Solid Waste Facilities
- Birth Characteristics
- 500 Cities Asthma and COPD Prevalence

**RESPONSE #5 :**

The Program Administrator will fix the broken links.

**FEEDBACK #6 :**

Coal has been mined in 76 of Illinois' 102 counties. Much of this mining occurred before the 1977 passage of the Surface Mining Control and Reclamation Act that mandated the cleanup of these sites. Many sites mined before 1977 have not been cleaned up, and these sites are called Abandoned Mine Lands. Many of these lands still pollute Illinois's air, water, and land and harm communities and local economies. This is an issue that impacts primarily rural areas of Illinois. We urge you to work with the Illinois Department of Natural Resources to help understand the impacts and locations of AMLs and consider their impacts in the self-designation process in Illinois.

**RESPONSE #6 :**

The Program Administrator is investigating the US Department of the Interior Bureau of Land Management's Abandoned Mine Land program and will work with the Illinois Department of Natural Resources to incorporate findings into the EJC Self-Designation process as applicable.

#### FEEDBACK #7 :

The transition on pdf pages 10 and 11 from the list of the 17 variables used in the U.S. EPA's EJSCREEN tool to the sample list of indicators may cause some confusion. No where does the document explicitly state that the list on pages 10 and 11 are suggested additional indicators that an applicant can use to "build the case." I will suggest they add the following (in red):

Note that several factors, ~~listed here~~, 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. ~~The sample list of environmental indicators below is intended to be representative of the pollutant types that a community may face. (the tool can be found here)~~

**insert: Because these factors have already been analyzed for applicants' communities, they should not be included in this self-designation application.**

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

#### RESPONSE #7 :

The Program Administrator agrees that clarifying wording should be added but does not agree that applicants should be instructed not to address the 17 variables. Rather, the applicant should be mindful that the EJ Screen data has been considered. If the applicant has additional information to share about any of the 17 variables, they should not be instructed to refrain from doing so. The Program Administrator approves the addition of the language adding clarity to the sample list of indicators. This update has been made to the process document.