



State of Oregon Department of Environmental Quality

# Environmental Justice Metrics

Clean Water State Revolving Fund 2022 Rulemaking Advisory Committee Meeting 2

To: Oregon DEQ CWSRF Rulemaking Advisory Committee

From: DEQ CWSRF Staff

RE: Environmental justice metrics

Date: Aug. 17, 2022

The Department of Environmental Quality Clean Water State Revolving Fund (DEQ CWSRF) intends to use environmental justice metrics to inform how it targets assistance to communities in Oregon. These metrics will be used for conducting outreach, providing technical assistance, scoring and ranking of loan applications, and awarding loan principal forgiveness.

This policy brief describes the environmental justice metrics under consideration, analyzes some of the effects that the metrics would have on eligibility for additional assistance, and provides a comparison to the Business Oregon's Distressed Areas indices, which DEQ CWSRF currently uses for determining eligibility for loan principal forgiveness.

DEQ CWSRF expects to refine the metrics in response to stakeholder and public feedback as well as further staff analysis.

## **Environmental justice metrics under consideration**

The environmental metrics being considered are intended to identify communities that are economically distressed, health burdened or pollution burdened. "Economically distressed" communities are defined as those that have low income or high unemployment. "Health burdened" communities are defined as those with low life expectancy or elevated health risks. "Pollution burdened" communities are defined as those located near an impaired waterbody or near a facility with a compliance violation.

**Table 1** summarizes the environmental justice metrics DEQ CWSRF is currently considering.

Table 1: Environmental justice categories, criteria and metrics

Category	Criteria	Metric
Economically distressed	Low income	At least 30.9% of the population lives under 200% of the poverty level. <sup>1</sup>
	High unemployment	At least 3.4% of the population 16 years and older in the civilian workforce are unemployed and at least 80% of the population 18 years or older is not enrolled in higher education. <sup>2</sup>
Health burdened	Low life expectancy	At or below the 30 <sup>th</sup> percentile for life expectancy. <sup>3</sup>
	Elevated health risks	At or above the 70 <sup>th</sup> percentile for asthma, diabetes or heart disease. <sup>4</sup>
Pollution burdened	Located near contaminated waterbody	Located within 1 km of a major waterbody or 2 km of minor waterbody that is impaired. <sup>5</sup>
	Located near a facility that has a compliance violation	Located within 1 km of a wastewater treatment facility with a health violation.

### Analysis of effects on eligibility for additional assistance

DEQ CWSRF will use the environmental justice metrics to determine a community’s eligibility for targeted outreach, technical assistance, additional points in the scoring of applications, and

<sup>1</sup> Centers for Disease Control and Prevention/ Agency for Toxic Substances and Disease Registry/ Geospatial Research, Analysis, and Services Program, “CDC/ATSDR Social Vulnerability Index 2018 Database Oregon,” accessed August 17, 2022, [https://www.atsdr.cdc.gov/placeandhealth/svi/data\\_documentation\\_download.html](https://www.atsdr.cdc.gov/placeandhealth/svi/data_documentation_download.html).

<sup>2</sup> Radhika Fox, “Implementation of the Clean Water and Drinking Water State Revolving Fund Provisions of the Bipartisan Infrastructure Law” (United States Environmental Protection Agency, March 8, 2022); White House Council on Environmental Quality, “Climate and Economic Justice Screening Tool,” Climate and Economic Justice Screening Tool, accessed August 17, 2022, <https://screeningtool.geoplatform.gov>.

<sup>3</sup> White House Council on Environmental Quality.

<sup>4</sup> White House Council on Environmental Quality.

<sup>5</sup> Laura August, “CalEnviroScreen 4.0,” California Office of Environmental Health Hazard Assessment, September 20, 2021, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>.

affordability criteria to determine loan principal forgiveness. DEQ CWSRF staff have conducted an analysis of some of the effects the metrics would have on eligibilities using data for cities and census tracts.<sup>6</sup> **Table 2** summarizes the findings, identifying the number and percentage of cities and census tracts that would be eligible for additional assistance under each metric. These findings are preliminary. DEQ CWSRF staff will share complete results once the analysis has been finished.

*Table 2: Environmental justice metrics and eligibilities*

Category	Criteria	Number and Percentage of Cities	Number and Percentage of Census Tracts
Economically distressed	Low income	139 (58%)	440 (45%)
	High unemployment	166 (69%)	679 (69%)
Health burdened	Low life expectancy	-	244 (31%)
	Elevated health risks	-	307 (37%)
Pollution burdened	Located near contaminated waterbody	-	-
	Located near a facility that has a compliance violation	-	-

### Comparison to Business Oregon Distressed Areas indices<sup>7</sup>

<sup>6</sup> Census tracts are small, relatively permanent statistical subdivisions of a county averaging about 4,000 inhabitants. They are a geographical unit used by the Census Bureau for the aggregation of population data and a commonly used unit of analysis in public policy.

<sup>7</sup> Business Oregon, “Distressed Areas in Oregon,” accessed August 17, 2022, <https://www.oregon.gov/biz/reports/Pages/DistressedAreas.aspx>.

Currently, DEQ CWSRF affordability criteria uses the Business Oregon’s Distressed Areas indices for determining eligibility for loan principal forgiveness. **Table 3** compares the cities that would be eligible using the Business Oregon Distressed Areas indices versus the economically distressed metrics under consideration. As the data indicates, the economically distressed metrics would significantly increase the number and percentage of Oregon cities that would be eligible for principal forgiveness compared to the Business Oregon indices, 196 cities (84% of all cities) versus 170 cities (73%), respectively.

*Table 3: Cities that would be eligible for principal forgiveness according to Biz Oregon’s Distressed Areas indices vs. economically distressed criteria*

	<b>Number of distressed cities</b>	<b>Percentage of distressed cities</b>
Economically distressed (low income or high unemployment)	196	84%
Business Oregon Distressed Areas	170	73%

**Alternative formats**

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).