



# **LCBP Disadvantaged Communities Definition**

NYCAC Discussion – 12/5

# Background

- LCBP is required to direct 40% of our BIL/Infrastructure funding to projects with outcomes that benefit disadvantaged communities in the Lake Champlain basin
- EPA guidance indicates that the definition should be limited to socioeconomic factors, not including race
  - Environmental quality indicators may be considered separately when prioritizing projects within disadvantaged communities

# Selecting Criteria

- Criteria must be captured by datasets that are available in NY and VT at sufficient granularity, or be something that applicants can easily self-identify
- LCBP + EPA staff reviewed the following definitions to identify criteria relevant to LCBP's definition:
  - Agency for Toxic Substances and Disease Registry's [Environmental Justice Indicator](#) (ATSDR EJI)
  - The Center for Disease Control and Agency for Toxic Substances and Disease Registry's [Social Vulnerability Index](#) (CDC SVI)
  - The Council on Environmental Quality's [Climate and Economic Justice Screening Tool](#) (CEJST)
  - EPA's [Environmental Justice Screening and Mapping Tool](#) (EJ Screen)
  - The New York State Climate Justice Working Group's [draft Disadvantaged Communities Criteria](#)
  - Vermont Act No. 154. [An act relating to environmental justice in Vermont](#)

# Criteria

- The Executive Committee has proposed to include the following 11 criteria in LCBP's definition:
  - Estimated prevalence of cancer
  - High school degree non-attainment
  - Housing cost burden
  - Lack of access to indoor plumbing
  - Linguistic isolation/limited English proficiency
  - Median household income
  - National School Lunch Program eligibility
  - Poverty rate
  - Presence of tribal lands or sites of cultural importance (state or federally recognized tribes)
  - Prevalence of mobile/manufactured homes
  - Unemployment rate

# Operationalizing the Definition

- Disadvantaged community status will be used as an additional lens when evaluating projects that meet the objectives outlined in *Opportunities for Action*
- A community that meets any **one or more** of the 11 criteria currently identified in LCBP's definition will be considered an underserved community
- LCBP and EPA are working to develop maps that will make it easy to determine where communities that meet these criteria are located

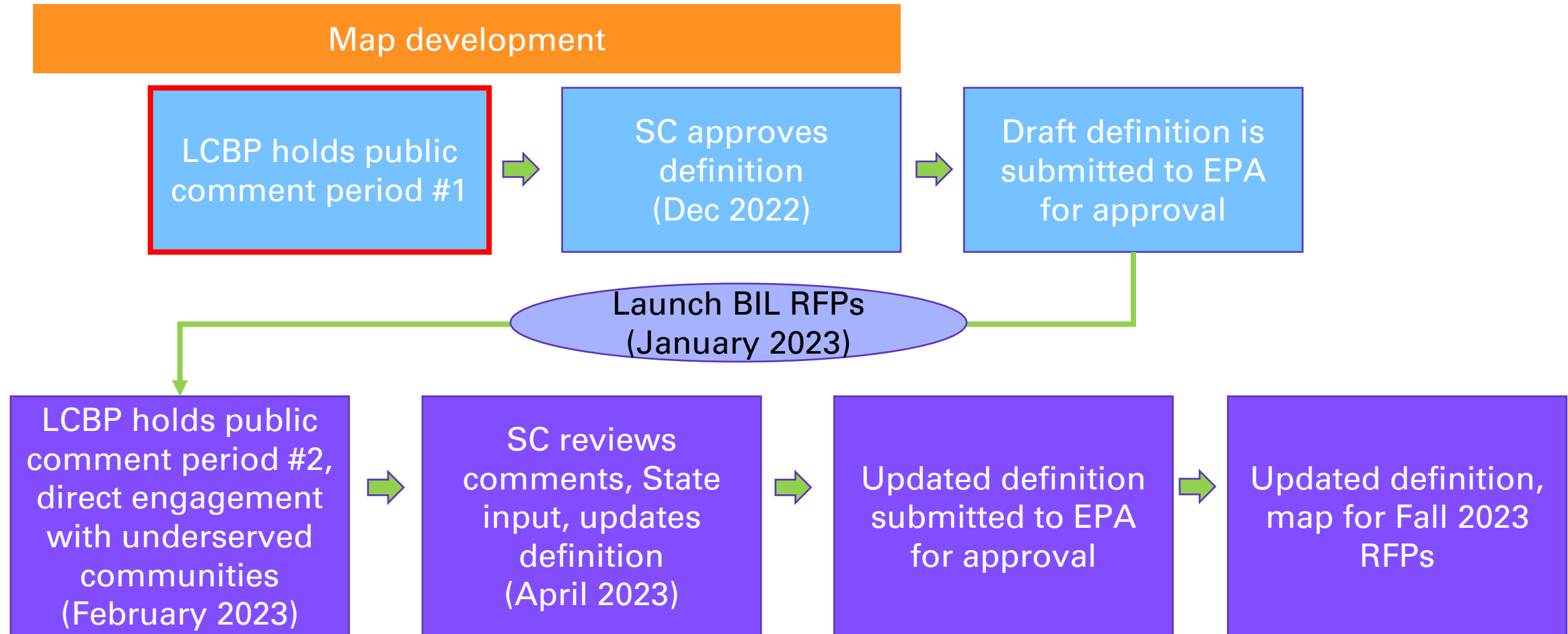
# Operationalizing the Definition, cont.

- All applicants will be given the opportunity to self-identify and provide a justification for why they should be considered a disadvantaged community, even if they are not identified on LCBP's map
- LCBP and EPA are also working to compile a list of environmental quality datasets relevant to LCBP's mission. We intend to develop maps showing these impacts and make them available to grantees to ensure all prospective applicants have access to the same data

# Preliminary List of Environmental Datasets

- Impaired surface waters (state 303(d) lists)
  - Includes waterways that are impaired for AIS
- Flood vulnerability
- Heat vulnerability
- Aquatic organism passage
- Cyanobacteria blooms
- Beach closures
- Brownfields and Superfund sites
- Proximity to active CSOs
- Soil health
- Lack of access to recreational sites/public lands

# Next Steps





# Public Comments Received to Date

- Suggestions for additional datasets to include:
  - Energy cost burden
  - Lack of access to recreational opportunities (*proposed for inclusion in environmental quality datasets*)
  - % of seasonal/second home occupation
  - Lack of access to cell phones, wireless reception, internet
  - Lack of access to electricity and heating/AC
  - Lack of access to clean drinking water
  - LGBTQ+
  - Disability status / chronic illness
  - Lack of friends – social connections
  - Income vs. healthcare costs not covered by insurance

# Public Comments Received to Date

- Other suggestions include:
  - Recommend aligning with The Guiding Principles for a Just Transition and related assessment tools and questions adopted by the Vermont Climate Council to guide the VT Climate Action Plan. This includes definitions and examples of frontline and impacted communities.
  - Criteria should be focused on the actual project benefit area, not an entire municipality/CDP
  - Special districts that reside inside the APA boundary, that are subject to higher levels of regulatory scrutiny to protect our environment, should be given a designation as 'disadvantaged' regardless of other subcategories proposed