



DATE: February 1, 2023

TO: Interested Parties Memo

FROM: Manuel Salgado, Environmental Justice Research Analyst

RE: Climate and Economic Justice Screening Tool Version Analysis - Version 1.0

Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*, is monumental because of its comprehensive approach to addressing legacy environmental harms, responding to the climate crisis, and bringing all Americans into a robust clean energy future.

The Justice40 Initiative is the Biden-Harris Administration's commitment to respond to decades of institutionalized harm in communities of color and/or areas of low income. The Climate and Economic Justice Screening Tool (CEJST) is central to ensuring the just and equitable distribution of 40 percent of the overall benefits of certain federal investments are received in areas most impacted by climate change and decades of disinvestment. Its design must be comprehensive, explicit and align with the intention of Executive Order 14008.

Early in 2022, the White House Council on Environmental Quality (CEQ) launched the Beta Version of the screening tool and solicited feedback from federal agencies, Tribal Nations, state and local governments, the White House Environmental Justice Advisory Council, environmental justice stakeholders, and the public. WE ACT for Environmental Justice was among those whom provide feedback¹ that included:

- Resolving the impact of omitting race as an indicator;
- Aligning data sets with recommendations made by the white House Environmental Justice Advisory Council; and
- Resolving the unintended consequences of making "disadvantaged" community calculations based on thresholds.

Late last year, CEQ released Version 1.0 of the CEJST, which incorporated feedback received in June and made changes to the methodology used to designate communities as "disadvantaged" in the Beta Version. These changes resulted in an increase in the number of people falling within census tracts selected by CEJST. However, this increase contains lower percentages of communities of color than the previous iteration of the tool and reduces the total percentage of communities of color.

This memo provides a breakdown of the demographic profiles of CEJST selected communities in both iterations of the tool, a preliminary analysis of how they differ, and recommendations for future iterations to ensure that those most impacted by environmental injustice and disinvestment are prioritized in federal action.

¹ <https://www.regulations.gov/comment/CEQ-2022-0002-2669>



Demographic Shift between CEJST Beta and Version 1.0

The communities newly added in Version 1.0 contain a population of more than 15 million people; however, the racial composition of the newly qualified additions differ significantly from the original Beta population. The largest demographic change between the Beta and Version 1.0 was in the percentage of non-Hispanic/Latino white persons. During the Beta, non-Hispanic/Latino white persons composed 36.27% of the population in selected communities. Census tracts losing their selected status in Version 1.0 were 43.06% non-Hispanic/Latino white but the tracts added in Version 1.0 were overwhelmingly white at 64.04% non-Hispanic/Latino white. The percentage of Black residents in the newly added communities was merely 11.77%. These changes resulted in the percentage of non-Hispanic/Latino white population increasing by 4.56% from the Beta.

Table 1-1

	Version 1.0	Beta	Change
Percentage Latino	31.64%	34.47%	-2.83%
Percentage white (Excluding Hispanic/Latino)	40.83%	36.27%	4.56%
Percentage Black	20.51%	22.28%	-1.77%
Percentage Native American	1.52%	1.48%	0.04%
Percentage Asian	4.22%	4.43%	-0.21%
Percentage Native Hawaiian/Pacific Islander	0.19%	0.20%	0.00%
Percentage Other	9.21%	10.15%	-0.94%
Percentage 2+ Races	3.38%	3.40%	-0.02%

On the other hand, percentages of communities of color either declined or saw very little change. The percentage of Black persons in the population of CEJST selected tracts in the Beta was 22.28%. In Version 1.0, the percentage has declined to 20.51%; a net drop of 2.83%. The Hispanic/Latino proportion of the Version 1.0 tracts has seen a similar decline of 1.77% from 34.47% to 31.64%.

There is an overall increase in the number of Black, Indigenous, and People of Color (BIPOC) in the Version 1.0 tracts. For instance, the total Black population saw an increase of more than 1.5 million from 20.8 million in the Beta to nearly 22.4 million in Version 1.0. However, between both iterations of the tool, the non-Hispanic/Latino white population increased by more than 10.6 million. This increase is much larger than the change in any of the other demographics and serves to increase the footprint of this demographic in the CEJST designated communities. Adding populations while decreasing the percentage of communities of color dilutes the benefits historically underserved communities can achieve from the Justice 40 initiative.

CEJST Beta Census Tract Population Demographics

The Beta Version of the CEJST designated 23,454 census tracts as “disadvantaged”. The American Community Survey (ACS) 2019 population estimates for these tracks are listed in Table 1-1.

Table 2-1

Not Hispanic/Latino	Hispanic/Latino	Total
61,200,259	32,191,914	93,392,173



Total			
white	33,872,833	20,366,235	54,239,068
Black	19,810,853	994,590	20,805,443
Native American/Alaskan	1,084,835	294,515	1,379,350
Asian	4,068,993	63,727	4,132,720
Native Hawaii/Pacific Islander	162,092	21,197	183,289
Other	251,800	9,226,421	9,478,221
2 or more races	1,948,853	1,225,229	3,174,082

Table 2-2

Percentage Latino	34.47%
Percentage white (Excluding Hispanic/Latino)	36.27%
Percentage Black	22.28%
Percentage Native American	1.48%
Percentage Asian	4.43%
Percentage Native Hawaiian/Pacific Islander	0.20%
Percentage Other	10.15%
Percentage 2+ Races	3.40%

Black, Hispanic/Latino, and Native American populations are all disproportionately captured within the census tracts selected in the Beta. An enormous amount of research has shown the outsized environmental burden that BIPOC communities carry and the CEJST Beta reflects this reality.

CEJST Version 1.0 Census Tract Population Demographics

Version 1.0 of the CEJST increased the number of tracts selected to 27,248. Using the updated methodology, 657 tracts lost and 4,451 tracts gained “disadvantaged” status for a net addition of 3,794 tracts. These additional tracts increased the total population living within CEJST selected communities to over 109 million. The ACS 2019 population estimates for Version 1.0 CEJST selected tracts are listed below in table 2-1.

Table 3-1

	Not Hispanic/Latino	Hispanic/Latino	Total
Total	74,591,974	34,525,529	109,117,503
white	44,555,620	21,967,774	66,523,394
Black	21,348,182	1,033,318	22,381,500
Native American/Alaskan	1,334,568	325,470	1,660,038
Asian	4,532,298	70,306	4,602,604
Native Hawaii/Pacific Islander	186,520	24,478	210,998
Other	280,544	9,772,950	10,053,494
2 or more races	2,354,242	1,331,233	3,685,475



Table 3-2

Percentage Latino	31.64%
Percentage white (Excluding Hispanic/Latino)	40.83%
Percentage Black	20.51%
Percentage Native American	1.52%
Percentage Asian	4.22%
Percentage Native Hawaiian/Pacific Islander	0.19%
Percentage Other	9.21%
Percentage 2+ Races	3.38%

Inclusion of Redlined Communities

Version 1.0 of the CEJST includes the addition of Redlining data into its methodology. For a tract that has experienced historical underinvestment to qualify, the community must also fall at or above the 65th percentile for low income. The tool identifies 4,045 census tracts as having experienced historic redlining. However, 1155 redlined tracts are not selected by the CEJST due to failure to meet the low-income threshold. Of the new tracts added in Version 1.0, 176 were considered redlined. Of these tracts, 167 meet multiple qualifying thresholds. In other words, only 9 census tracts were added because of the addition of redlining to the methodology. Redlined tracts contain significantly higher percentages of BIPOC than other newly qualified communities in Version 1.0 but only account for a tiny portion of the 4,451 tracts added through the updated methodology.

The addition of redlining data into the methodology of the CEJST was a sound decision given the overlap of environmental problems within redlined communities. The overlap of redlined communities with high levels of economic and environmental burden is captured well by the CEJST methodology. However, in its current form where redlining is applied in only one category (Housing) and redlined census tracts must meet a low income threshold, the CEJST methodology limits the impact of the redlining data. On one hand, almost all of the newly added redlined tracts qualifying in multiple categories shows the CEJST tool's methodology has captured many of the systemic issues facing these communities through other datasets. However, by adjusting the low-income threshold in a manner similar to exceptions made for communities surrounded by other CEJST selected tracts, CEQ can allow more redlined communities to be designated by the CEJST and increase the amount of people living in historically discriminated communities within the CEJST population.

Cumulative Impacts

Unfortunately, the methodology of Version 1.0 does not incorporate any measure of cumulative impact. However, by categorizing CEJST selected communities based on how many of the CEJST category thresholds they meet, we can characterize communities that shoulder an increased environmental burden. CEJST methodology assess census tracts in 8 categories where specific variables are examined. When a category's variables exceed a threshold and the community also meets a low-income threshold, the tract is considered "disadvantaged". A subset of the tracts selected by the CEJST do not meet the threshold for any of the 8 categories but instead are qualified due to being surrounded by CEJST selected communities and meeting an adjusted low-income threshold. As such, selected census tracts can have as few of zero categories met and as many as 8.



Aggregating the communities by the number of categories where they surpass the thresholds reveals the disproportionate burden that communities of color shoulder. Tracts that meet CEJST thresholds in 3 or more categories contain just over half (50.89%) of the persons living in CEJST selected communities. However, these same tracts contain 56.5% of the Latino population and approximately two-thirds (65.09%) of the Black population found in CEJST selected tracts. The Black population in census tracts meeting 2 or less of the CEJST categories is 7.8 million people while the Black population in census tracts meeting at least 3 of the categories is 14.5 million people. This means that a Black resident of a community selected by the CEJST tool is nearly twice as likely to live in a community that carries more environmental and economic burden.

The flip side of this distribution is that in CEJST designated communities, those with lower environmental burden are disproportionately white. Communities where the cumulative number of categories with thresholds met is less than or equal to 2, are essentially ½ white (49.75) and contain 59.83% of all white persons living in CEJST selected communities.

Many communities are unfairly carrying an enormous environmental burden and grouping all communities identified by CEJST together in one category does not capture this inequity. Treating all communities selected in the tool as having equivalent levels of need is inaccurate and could be overcome with a more sophisticated measure. Census tracts with higher levels of environmental burden are primarily communities of color. Ensuring these communities receive a greater portion of the benefits from policies, as intended by Justice40, to address higher levels of impact they unfairly shoulder is an important environmental justice issue.

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WE ACT for Environmental Justice is a Northern Manhattan membership-based organization whose mission is to build healthy communities by ensuring that people of color and/or low-income residents participate meaningfully in creating sound and fair environmental health and protection policies and practices. WE ACT has offices in New York and Washington, D.C. Visit us at weact.org and follow us on [Facebook](https://www.facebook.com/weactnyc), [Twitter](https://twitter.com/weactnyc), and [Instagram](https://www.instagram.com/weactnyc).

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