

Advocacy Recommends Changes to Council on Environmental Quality's Beta Version of Its Climate and Economic Justice Screening Tool

On May 25, 2022, the Office of Advocacy (Advocacy) submitted public comments to the Council on Environmental Quality (CEQ) on the beta version of its Climate and Economic Justice Screening Tool (CEJS Tool). The CEJS Tool identifies which communities are disadvantaged under the Justice40 Initiative. The Justice40 Initiative instructs federal agencies to direct “40 percent of the overall benefits” from certain Federal investments to bolster clean energy and economic mobility to “disadvantaged communities.”¹ On July 20, 2021, CEQ, OMB, and the National Climate Advisor distributed Interim Implementation Guidance for the Justice40 Initiative, which contains indicators to identify whether a community should be considered “disadvantaged.” These indicators include the following:

1. Low income, high and/or persistent poverty,
2. high unemployment and underemployment,
3. racial and ethnic residential segregation,
4. linguistic isolation,
5. high housing cost burden and substandard housing,
6. distressed neighborhoods,
7. high transportation cost burden and/or low transportation access,
8. disproportionate environmental stressor burden and high cumulative impacts,
9. limited water and sanitation access and affordability,
10. disproportionate impacts from climate change,
11. high energy cost burden and low energy access,
12. jobs lost through the energy transition, and
13. access to healthcare.²

Under the CEJS Tool, a community is “disadvantaged” “if the census tract is above the threshold for one or more environmental or climate indicators” and “above the threshold for the socioeconomic indicators.”³ The CEJS Tool indicators do not mirror the Interim Implementation Guidance indicators.

Advocacy encourages CEQ to ensure that the beta version of the CEJS Tool considers additional indicators that identify the diverse types of disadvantaged communities. Advocacy recommends CEQ include additional socioeconomic indicators in the CEJS Tool and that CEQ directly engage with small governmental jurisdictions and their residents to understand what makes a community disadvantaged.

For more information visit Advocacy's web page at advocacy.sba.gov or contact Astrika Adams at (202) 798-7750 or astrika.adams@sba.gov.

¹ Id.

² See id.

³ See Climate and Economic Justice Screening Tool Beta, Methodology & Data, Council on Environmental Quality, available at <https://screeningtool.geoplatform.gov/en/methodology#3/42.09/-122.17> (last accessed April 18, 2022).

