



Community Engagement Assessment Template

FACILITY NAME

DATE

Approved by Lead CAO Modeler (name and date): _____

Approved by Regional Manager (name and date): _____

Approved by CAO Manager (name and date) _____

Community Engagement Assessment Summary and Recommendations

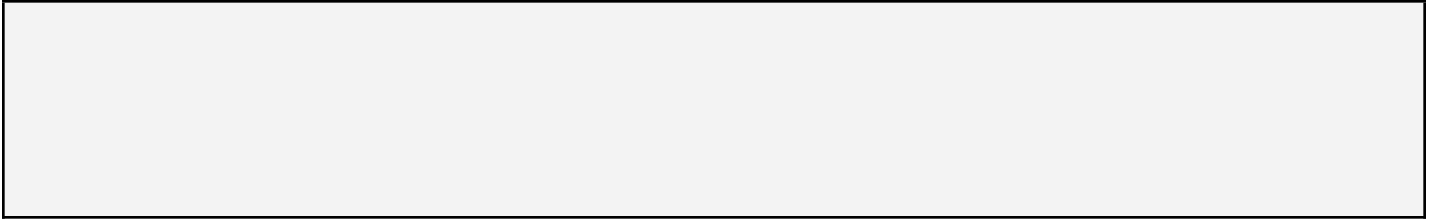
Facility Description

Environmental Justice Considerations

Recommendations for Discretionary Community Engagement or Public Involvement

Facility Description

Provide a brief description of the facility, including but not limited to location, operations, and reason for inclusion in the Cleaner Air Oregon program



Facility Map

Insert a map of the facility demonstrating its location relative to surrounding businesses or residences

Step 1: Screen for potential environmental justice and vulnerable population considerations

Follow the steps below to screen for environmental justice and vulnerable population considerations. EJSCREEN results should be supplemented with additional information and local knowledge to get a better understanding of the issues in a selected location.

1. Follow the CAO EJSCREEN Instructions in Appendix A to access and download community reports
2. Compare information from the EJSCREEN reports and any other additional data sources to identify environmental justice and vulnerable population considerations for the surrounding community.
 - a. **(optional)** If EJSCREEN outcomes are close to designated thresholds (80th percentile for EJ Index and Environmental Indicators; 60th percentile for Demographic Indicators), cross-reference findings with other data sources (such as [US Census data](#) or the [University of Wisconsin's Neighborhood Atlas](#)) to inform a better understanding of the community. Report your findings from this additional research in the space below.
3. Cut and paste the EJ Index, Environmental Indicators, and Demographic Indicators tables from the EJSCREEN Report into the designated space below.
4. Annotate the EJSCREEN analysis:
 - a. Identify the radius used for the EJSCREEN analysis and provide a justification for this decision (i.e., facility stack height, permit writer recommendation, etc.).
 - b. Describe the environmental justice and/or vulnerable population community conditions. Provide relevant data and a description of the indexes or indicators that are near or above screening threshold values. Link to relevant data and information sources.

EJSCREEN Report Tables

EJSCREEN Map Radius & Justification:

EJSCREEN Results:

Does this community have any environmental justice or vulnerable population concerns, as demonstrated through your assessment using the EJSCREEN tool?

YES _____ **NO** _____

Step 2: Review facility maps

Review the facility's regional Facility Map to determine if the surrounding community is within the vicinity of other CAO facilities. This includes facilities that have already been called into the CAO program and facilities that will be called into CAO at a future date. Also review the [DEQ Facility Profiler](#) to determine if the surrounding community is within the vicinity of other significant environmental sites, clean-ups or activities regulated by DEQ.

This assessment will identify communities that are impacted by multiple facilities and therefore are likely to be disproportionately exposed to toxic air contaminants. It will also help identify individuals and stakeholder groups that may have already been engaged in CAO or other community public health issues, and could be consulted to help inform future community engagement plans.

Raise the community engagement tier by one level if facilities posing potentially higher risk for toxic air contaminants are located within 1.5 miles of this facility or are known to have an impact on the assessed community. For example, if a facility is assigned as "Minimal CE" based on all other assessment factors but is proximity to a potentially high risk facility, the facility should be considered "Moderate CE." Potentially high risk facilities are defined as facilities that are expected to be designated as Moderate (Tier II) or High Community Engagement (Tier III) based on what is already known about the assessment factors included within this document.

Is this community within the vicinity of other facilities that have already been called into CAO, or other facilities that will be called into CAO at a future date?

YES _____ **NO** _____

If yes, please describe below by identifying nearby facilities and their distance from this facility as the crow flies.

Step 3: Assess the facility’s history and profile within the community

To help evaluate the priorities and needs for community engagement during the CAO process, it is helpful to understand the facility’s regulatory history, relationships it has with the community now and in the past, and any known community concerns about the facility. Table 1 below should be completed to assist in the process of understanding this relationship.

Answer the following questions to the best of your ability. This may require consultation with DEQ regional staff, DEQ permit writers, DEQ compliance staff, CAO technical teams, DEQ Regional Solutions staff, Oregon Health Authority, local public health agencies, or other individuals who have insight into the facility’s history or relationship with DEQ and the surrounding community. Consultation with these stakeholders is imperative to accurately understanding and assessing these community engagement factors.

For questions containing multiple components, underline or highlight the component(s) within the Question column for which you are responding “yes.”

Table 1: Community & Facility Assessment

Question	Yes	No	Unknown or N/A
<p>1. Does the facility have a history of non-compliance, enforcement action, fines, or penalties from DEQ?</p> <p><i>This includes compliance with all DEQ regulatory sections, not just air quality monitoring. Gather this information by checking DEQ Enforcement Actions since 2016 and sorting on facility name. Also, when logged into DEQ computer system or remotely through VPN, go to ACES, Reports, and select Report 62, AQ Active HPV (High Priority Violator) Report Program to check for the facility. Finally, ask the permit writer about compliance history.</i></p>			
<p>2. Is there any involvement, enforcement, oversight, or interest from other government agencies?</p> <p><i>This may include but is not limited to local health departments, the Oregon Health Authority, or the Environmental Protection Agency.</i></p>			
<p>3. Does the facility have a relationship with the local community or a history of facility-community meetings, organizations, agreements, or negotiations?</p>			
<p>4. Is there a history of complaints about this facility, including complaints about nuisance odors or noise?</p> <p><i>Gather this information by logging into DEQ’s Complaints Database on QNet and following the procedure to run a report outlined in Appendix B. Also check with the facility permit writer to find out if the facility’s annual compliance report or inspection reports indicate complaints.</i></p>			
<p>5. Have community groups, elected officials, or media expressed interest or concern with this facility?</p>			
<p>6. Is this facility located near Tribal land, or have any Tribes or tribal representatives expressed interest in this facility?</p>			

<p>7. Is there a possibility of broad public interest with this facility?</p> <p><i>For example, high-profile facilities or facilities with high community involvement or employment.</i></p>			
<p>8. Are there environmental justice or vulnerable population concerns associated with this facility (from assessment in Step 1 above)?</p>			
<p>9. Are there any other facility or community factors that should be considered in this assessment?</p> <p><i>For example, is this community disproportionately exposed to toxic air contaminants based on your Facility Map assessment in Step 2? Have you identified any other relevant information that is not included in this checklist?</i></p>			

If you answered “yes” to any of the questions in Table 1, please provide an objective and factual summary of relevant information in the space below. Include any relevant numerical data.

Avoid any language or statements that contain opinion, commentary, hearsay or labels. Arrange a meeting with community engagement staff, CAO Program Manager, AQ Manager, and Regional PIO to discuss potentially sensitive or subjective findings to ensure this summary is factual and unbiased.



Step 4: Share and consider assessment findings

Based on your assessment in Step 3, make recommendations for any discretionary community engagement or public involvement activities. There is no prescriptive approach in determining if, when, and how to engage a community. This decision should be made collaboratively with appropriate CAO staff by considering the amount of questions you responded with “yes” in Table 1 and by using your best judgement.

Recommendations for Discretionary Community Engagement or Public Involvement

Once you have shared the community engagement assessment findings with appropriate CAO staff, complete this assessment by providing recommendations for discretionary community engagement or public involvement activities. Provide a justification for your recommendations and summarize key findings on Page 1 of this report.

Refer to Appendix C for a list of potential discretionary community engagement or public involvement activities.

Appendix A: EJSCREEN Instructions

[EJSCREEN](#) is an environmental justice screening and mapping tool developed by the Environmental Protection Agency that utilizes standard and nationally consistent data to highlight places that may have higher environmental burdens and vulnerable populations.

EJSCREEN displays demographic and environmental information and includes a method for combining these indicators into environmental justice (EJ) indexes. Environmental indicators typically are direct or proxy estimates of risk, pollution levels or potential exposure (e.g., due to nearby facilities). Demographic indicators are often used as proxies for a community's health status and potential susceptibility to pollution. Environmental and demographic data and indicators may be viewed separately or in combination.

This step-by-step guide is just one way to use EJSCREEN. For more detailed instructions, visit [EPA's EJSCREEN website](#).

1

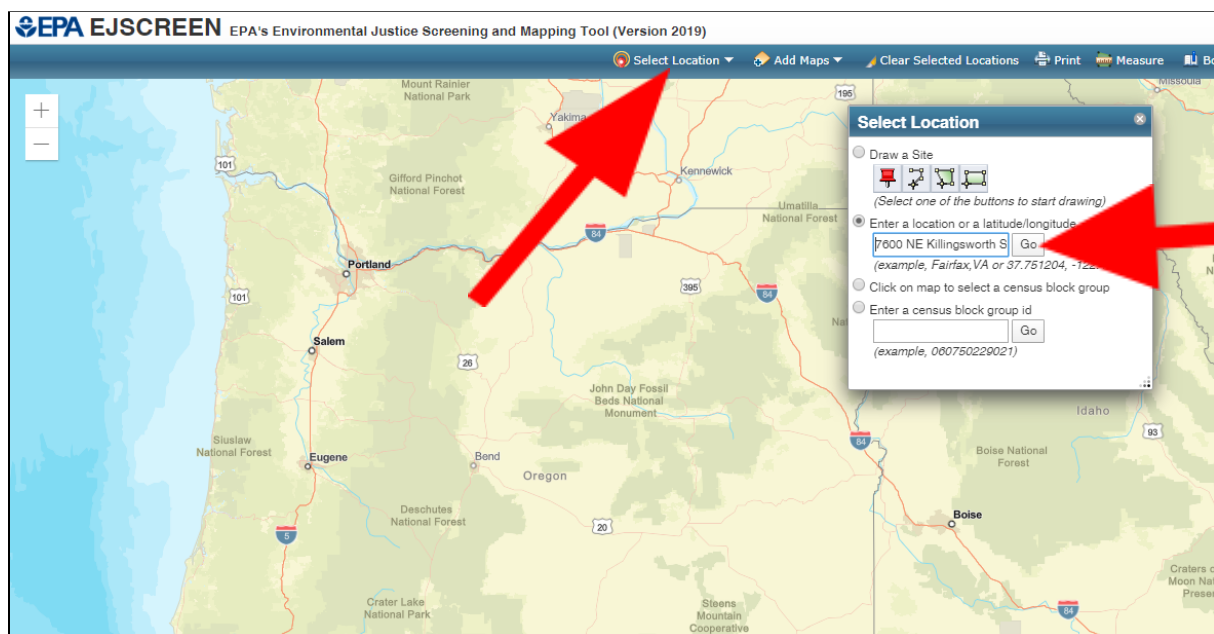
Open EJSCREEN Mapper

- Visit: <https://ejscreen.epa.gov/mapper/>

2

Locate the facility

- Click on the "Select Location" button at the top of the page; choose "Select Location" from the drop-down box
- In the pop-up box, enter the facility address or latitude/longitude and click "Go"

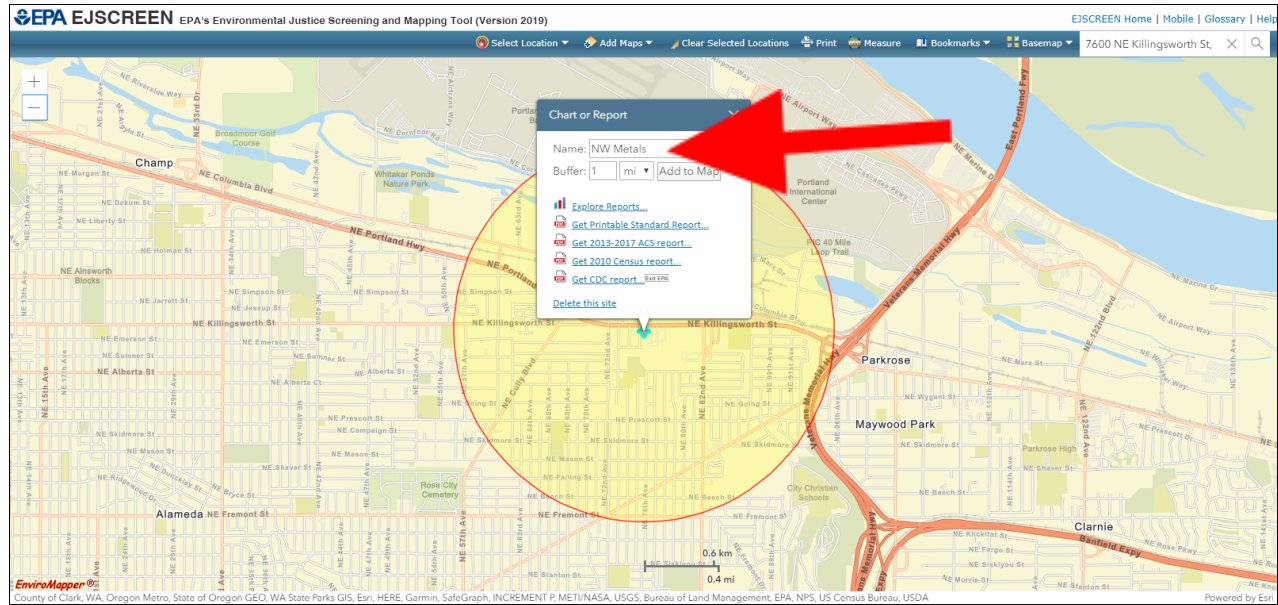


3

Select a buffer around the facility

- Click on the map icon for your facility to open the "Chart or Report" pop-up box
- Name your facility and select a buffer
- Consult the facility's permit writer and other relevant CAO staff to determine the potential range of impact and appropriate buffer radius. Use a 1.5 mile buffer as the default option. Check with DEQ Cleaner Air Oregon Modelers for larger facilities to determine if a large buffer should be used.
- Select "Add to Map"

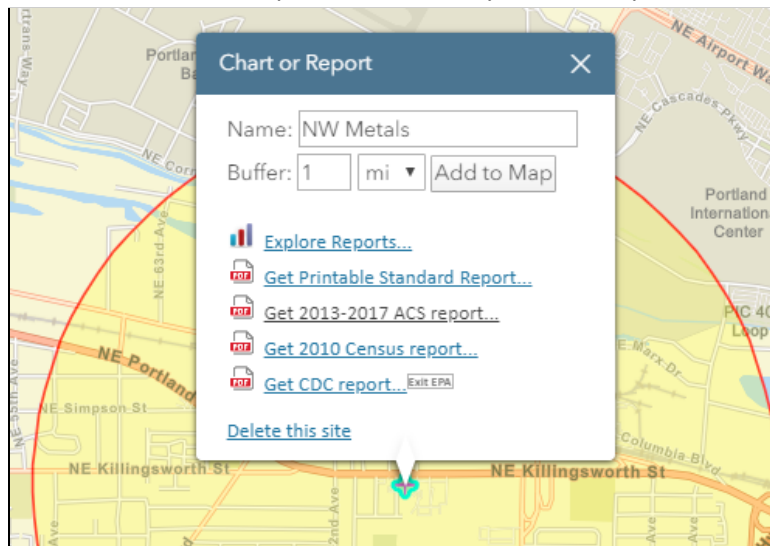
E. The buffer will appear as a shaded yellow area on the map



4

Generate reports

- A. Open the following reports by selecting “Get X report”:
 - a. Printable Standard Report
 - b. 2013-2017 ACS Report
 - c. 2010 Census Report
 - d. CDC Report
- B. Save all four reports in the facility folder for quick reference and easy access



5

Review and interpret the EJSCREEN Standard Report

- A. Visit the [Understanding EJSCREEN Results](#) webpage for information on how to interpret the [EJ Indexes](#), [Environmental Indicators](#), and [Demographic Indicators](#) results in the Standard Report; you can also review the [EJSCREEN Technical Document](#) for more detailed information on these indexes and indicators
 - a. **NOTE:** The EJ Index is a combination of environmental factors and demographic information

(low-income population + minority population). There are 11 EJ Indexes reflecting the 11 environmental indicators. To calculate a single EJ Index, EJSCREEN uses a formula to combine a single environmental factor with the demographic indicator. It considers how much the local demographics are above the national average. It does this by looking at the difference between the demographic composition of the block group, as measured by the Demographic Index, and the national average (which is approximately 35%). It also considers the population size of the block group, although most block groups are similar in population size.

EJ Index =

(The Environmental Indicator) * (Demographic Index for Block Group - Demographic Index for US)
* (Population count for Block Group)

- b. **EXAMPLE 1:** Suppose that in a certain block group of 1000 people, 350 (35%) are minority and 350 (35%) low-income. There might be 200 (20%) who are low-income but not minority, and 200 (20%) who are minority but not low-income. In that case, there would be 150 (15%) who are both, and 450 (45%) who are neither. Therefore, there actually would be 550 (55%) who were either minority, low-income or both.

The Demographic Index would use 35% in this case, which falls between the 15% who were both minority and low-income, and the 55% who were in at least one of these groups. These detailed numbers cannot be obtained from the ACS by block group. Therefore, to represent both groups in a simple way, the average is used.

- c. **EXAMPLE 2:** Suppose a block group has 1000 people but is 0% minority and 100% low-income. The demographic index would be 50%, or the equivalent of 500 "potentially susceptible individuals" in this case. The same would be true in a block group that was 100% minority but 0% low-income – it would be treated as having the equivalent of 50% (500) "potentially susceptible" for the sake of these examples.

- B. Identify the EJ Indexes and Environmental Indicators that are at the 80th percentile or above for Oregon; EPA uses the 80th percentile as a starting point for the purpose of considering environmental justice concerns in an area per their [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis](#) document.

Identify the Demographic Indicators that are at or above the 60th percentile. *This lower threshold provides more sensitivity in identifying communities with socioeconomic disparities and barriers to risk communications.*

- C. Review the Linguistically Isolated Population data separately to determine whether translation accommodations are appropriate for this community (i.e. do not follow the 80% threshold for this indicator)

EJSCREEN Report (Version 2019)
1 miles Ring Centered at 45.562229,-122.585020
OREGON, EPA Region 10
Approximate Population: 12,978
Input Area (sq. miles): 3.14
NW Metals

Selected Variables	Percentile in State	Percentile in EPA Region	Percentile in USA
EJ Indexes			
EJ Index for Particulate Matter (PM 2.5)	83	83	66
EJ Index for Ozone	82	82	65
EJ Index for NATA* Diesel PM	88	88	74
EJ Index for NATA* Air Toxics Cancer Risk	84	84	68
EJ Index for NATA* Respiratory Hazard Index	85	85	70
EJ Index for Traffic Proximity and Volume	89	89	78
EJ Index for Lead Paint Indicator	83	83	72
EJ Index for Superfund Proximity	87	85	72
EJ Index for RMP Proximity	80	79	64
EJ Index for Hazardous Waste Proximity	96	95	87
EJ Index for Wastewater Discharge Indicator	92	92	86

EJ Index for the Selected Area Compared to All People's Blockgroups in EPA Region/US

Sites reporting to EPA		
Superfund NPL		0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)		2

Selected Variables	Value	State		EPA Region		USA	
		Avg.	%tile	Avg.	%tile	Avg.	%tile
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	7.23	6.63	69	6.6	73	8.3	21
Ozone (ppb)	32.9	34.2	38	35.1	44	43	6
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.877	0.393	94	0.479	80-90th	0.479	80-90th
NATA* Air Toxics Cancer Risk (risk per MM)	38	31	89	31	70-80th	32	70-80th
NATA* Respiratory Hazard Index	0.61	0.48	90	0.46	80-90th	0.44	80-90th
Traffic Proximity and Volume (daily traffic count/distance to road)	1100	480	90	500	89	750	83
Lead Paint Indicator (% pre-1960s housing)	0.65	0.25	91	0.23	92	0.28	84
Superfund Proximity (site count/km distance)	0.084	0.083	65	0.13	58	0.13	60
RMP Proximity (facility count/km distance)	0.19	0.78	42	0.65	43	0.74	36
Hazardous Waste Proximity (facility count/km distance)	5.5	1.4	94	1.5	93	4	91
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.0028	0.0056	81	31	82	14	72
Demographic Indicators							
Demographic Index	40%	29%	79	29%	78	36%	63
Minority Population	42%	23%	85	27%	79	39%	60
Low Income Population	38%	34%	60	31%	67	33%	63
Linguistically Isolated Population	8%	3%	90	3%	87	4%	81
Population with Less Than High School Education	15%	10%	77	9%	80	13%	67
Population under Age 5	6%	6%	59	6%	53	6%	54
Population over Age 64	10%	16%	25	15%	31	15%	31

*The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific communities. For more information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

6 Compare information from the other EJSCREEN Reports

- Review the 2013-2017 ACS Report, 2010 Census Report, and CDC Report to more clearly understand the community's demographics, health inequities, community challenges, and potential barriers to engagement

7 Report your findings

- Describe the environmental justice and/or vulnerable population considerations for this community under Step 1 in the Community Engagement Assessment document

8 Consider the following practices to remove barriers to meaningful engagement

Minority Population

- Consider meeting venues familiar to community members. This could include informal settings where people would feel more comfortable engaging with CAO

	<p>staff.</p> <ul style="list-style-type: none"> ● Identify events and meetings organized by the community. These are often good opportunities where you can introduce yourself and share project information. ● Work with local leaders and groups to learn about effective ways to reach and engage their community. ● Ask the community how they would like to receive information.
Low Income Population	<ul style="list-style-type: none"> ● Plan your meetings and outreach so that they are accessible to as many community members as possible. ● Hold meetings at locations that are close to transit lines. ● Post hard copies of materials at local community centers and libraries. ● When possible, provide food and childcare free of charge at public meetings ● Hold meetings at times when more people might be available to attend (such as the evening or weekend).
Linguistically Isolated Population	<ul style="list-style-type: none"> ● Review your EJSscreen report to see if there are people who are Linguistically Isolated. This is the exception to the 80th percentile threshold guidance. If the report indicates there is a linguistically isolated population, you should find out how many individuals speak English “less than very well” and which languages are spoken. ● To find more information about the linguistically isolated populations to determine if translation is needed, use the American Fact Finder (US Census) database to determine which languages are spoken. ● If the Census data indicate there are non-English speaking language groups that make up 5% or 1,000 people in your intended audience, then you should consider translating vital written documents and working with interpreters.
Less than High School Education	<ul style="list-style-type: none"> ● Plain talk all written material and web content. ● Consider using video or audio clips of project summaries and other information to convey your message. ● Focus on graphics to communicate, and reduce the amount of text.
Population over Age 64	<ul style="list-style-type: none"> ● Provide audio clips of information. ● Choose venues that are along transit routes. ● Choose venues with parking lots that are close to the building to reduce the distance people need to walk to get to the meeting. ● Provide presentations on large screens, limit the amount of text, and use large font sizes. ● Provide hard copies of information at local libraries or community spaces.

*State of Washington: https://fortress.wa.gov/ecy/ezshare/wa/permits/HowTo_EJ_Screen.pdf

Additional EJSCREEN Resources:

- [Technical Documentation for EJSCREEN](#)
- [User Guide for EJSCREEN](#)
- [Glossary of EJSCREEN Terms](#)
- [EJSCREEN Videos](#)
- [Technical Guidance for Assessing Environmental Justice in Regulatory Analysis](#)

Appendix B: DEQ Complaints Database Instructions

How to check the DEQ complaints database:

First, contact Bryan Smith at DEQ to get authorization to use the database.

Do an online walk through of the database with Bryan Smith.

Bryan.Smith @state.or.us, (503) 229-5376

1. Go to Q Net
2. Click on the Complaints Database in Quick Links
3. Log in with Last.First username and set up a new password
4. Click on the nCIDENT System database
5. Go to My Tasks and open Reports
6. Start a New Report, go to Data Viewer, For Data Source choose nCIDENT
7. Add Filter, in cause box choose All Field Search, enter the name of the facility
8. Get Results, export to Excel for readability. Cause of complaint and resolution is on the far right of the sheet.

Appendix C: Potential Community Engagement or Public Involvement Activities

Below is a list of community engagement and public involvement activities you may consider completing, based on the findings from the Community Engagement Assessment. Plan for these activities by considering the findings from the assessment and using your best judgement. Use the Community Engagement Planning Template to help plan, implement, and evaluate these activities.

Discretionary community engagement activities may include:

1. Developing a facility web page
2. Creating a tailored facility fact sheet
3. Outreach with community members, community leaders, advocates, community-based organizations, local government, local public health, or other stakeholders with a vested interest in the community
4. Facility-specific communication via web, social media, flyers, postcards, or other culturally-appropriate communication channels
5. Hosting a community meeting
6. Hiring a technical expert liaison or facilitator to support engagement activities
7. Forming a community committee