

Staff Memorandum

To: Chair and Members of the Oregon Environmental Justice Council
From: Eric Main, Oregon Health Authority
Date: September 23, 2026

Regarding: Agenda Item 4: EJ Mapping Tool – Adopt EJ Community Thresholds

The Oregon Environmental Justice Mapping Tool project has recently completed sensitivity analysis for the approved indicators and adoption of indicators for the Statewide, Coastal, Remote, Rural, Large City, and Small City indices on August 12, 2026.

Staff will present detailed information to support the Oregon Environmental Justice Council in selecting and adopting an environmental justice community threshold. This threshold will determine how many Oregon census tracts are designated as environmental justice communities. The presentation will illustrate how many communities and residents would be included if the threshold were set at four possible percentile options: 75th, 80th, 85th, and 90th. These percentiles are provided for comparison purposes and should not be interpreted as the only options available to the Council.

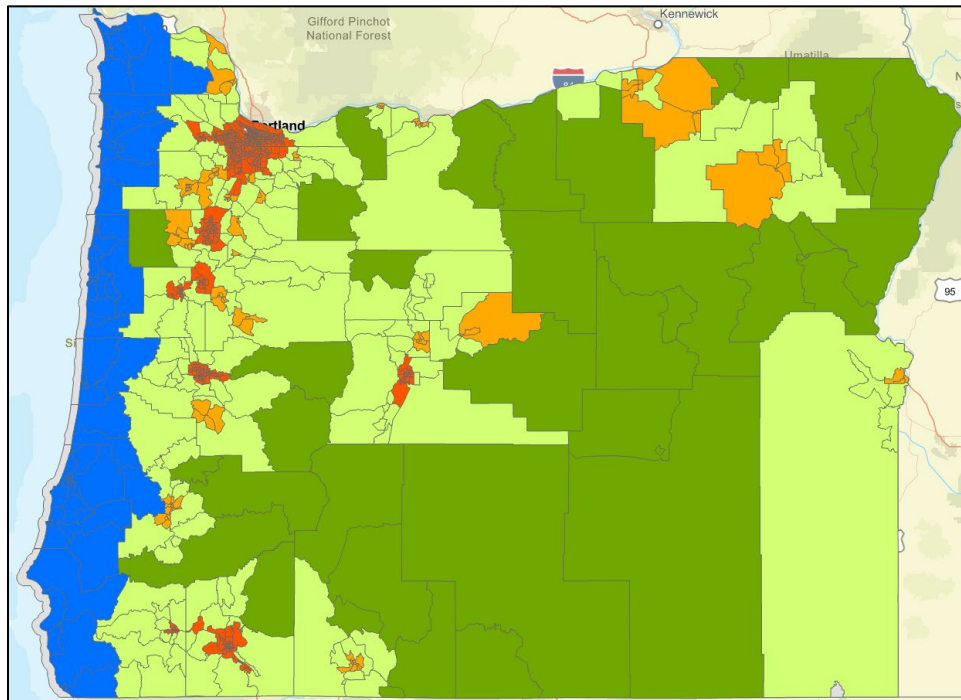
The presentation will also identify which community designations are overrepresented or underrepresented in the statewide index at each of the four percentile levels. Finally, the Council will consider guidance offered to EJMT users for communities that fall below the threshold, including the potential use of an absolute cutoff score.

EJ Community Threshold Overview

The EJ community threshold will serve as the gatekeeper for natural resources agencies' EJ-focused funding, grant opportunities, rule adoption, policies, and guidelines. There are few important points for the Oregon Environmental Justice Council (EJC) to consider:

- If the threshold disproportionately excludes certain geographies (e.g., rural vs. urban tracts) or demographic groups, that can undermine the EJ Mapping Tool's legitimacy and invite criticism that it's not actually capturing disparate impact. Community designations, adopted by the EJC in 2024, serve as a safeguard limiting under and overrepresentation of communities.

Community Designation Map



- Setting the threshold too high could mean resources concentrate in a small number of overly burdened areas while other genuinely burdened communities are possibly overlooked even though they may be facing an emerging or worsening situation.
- If too many tracts qualify as EJ communities; policymakers, funders, and the public lose the ability to distinguish genuinely severe cases from moderate ones — everything looks urgent, so nothing gets prioritized.
- Grant programs and mitigation funding are finite. A low threshold spreads that funding thin across a much larger pool of qualifying tracts, meaning the most severely burdened communities get a smaller share than they would under a tighter, better-targeted list.

- What guidance should be given to tool users for communities with a score below the EJ community threshold? What's the absolute cutoff?

Oregon Community Statistics

Communities in Oregon are defined by 2020 Census tract boundaries.

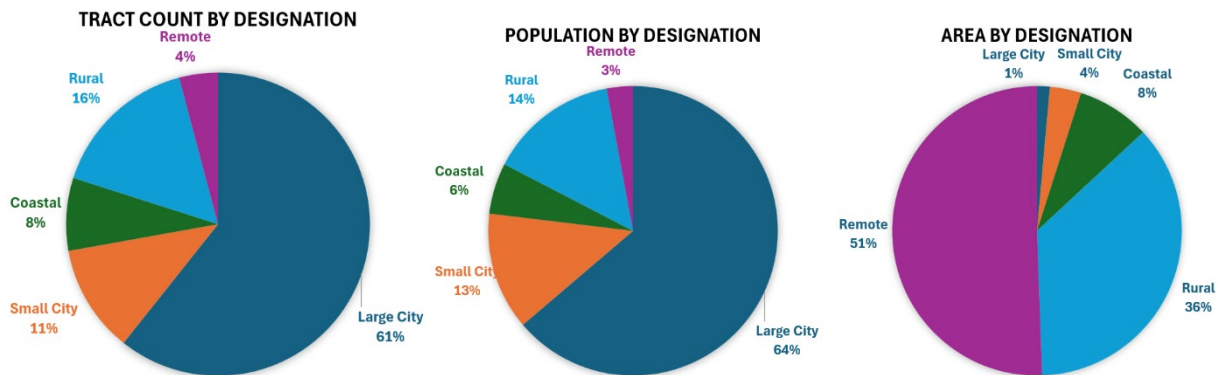
- Number of inhabited tracts = **992**
- Total population (2024 ACS) in inhabited tracts = **4,254,293**
- Total area (land and water) in inhabited tracts = **95,964 square miles**

The table and charts below show how tracts, population, are total area (land + water) are portioned by community designation. More than two-thirds of the state's population live in communities designated as large city and nearly 77% live in tracts designated as large city or small city.

Table 1

Community Designation	Number of Tracts	Total Population	Total Area (SqMi)
Large City	602	2,712,545	1,368
Small City	114	559,202	3,354
Coastal	77	242,635	7,837
Rural	158	615,436	34,896
Remote	41	124,474	48,509

Community Designation Pie Charts: Tract Count by Designation, Population by Designation, and Area by Designation



Environmental Justice Communities by Percentile & Designation

The percentile determines how many tracts are designated as EJ communities in the statewide map (i.e. 80th percentile means 20% of tracts designated as an EJ community). Community designation indices add additional tracts to the total number EJ communities coming mostly from coastal and rural communities (Tables 2 & 3).

Table 2

Percentile	Statewide Only	Statewide + Designations	Population
75th	248	269	1,119,948
80th	199	219	927,331
85th	149	166	707,499
90th	100	111	479,117

Table 3

EJ Community Tracts not in the Statewide Index

Percentile	Large City	Small City	Coastal	Rural	Remote
75th	1	0	16	4	0
80th	0	0	13	7	0
85th	0	0	11	6	0
90th	0	0	8	3	0

Table 4

EJ Community Tracts

Percentile	Large City	Small City	Coastal	Rural	Remote	Total
75th	151	35	20	40	23	269
80th	125	31	16	32	15	119
85th	94	24	12	24	12	166
90th	61	18	8	16	8	111

Community Designation Pie Charts: Tract Counts

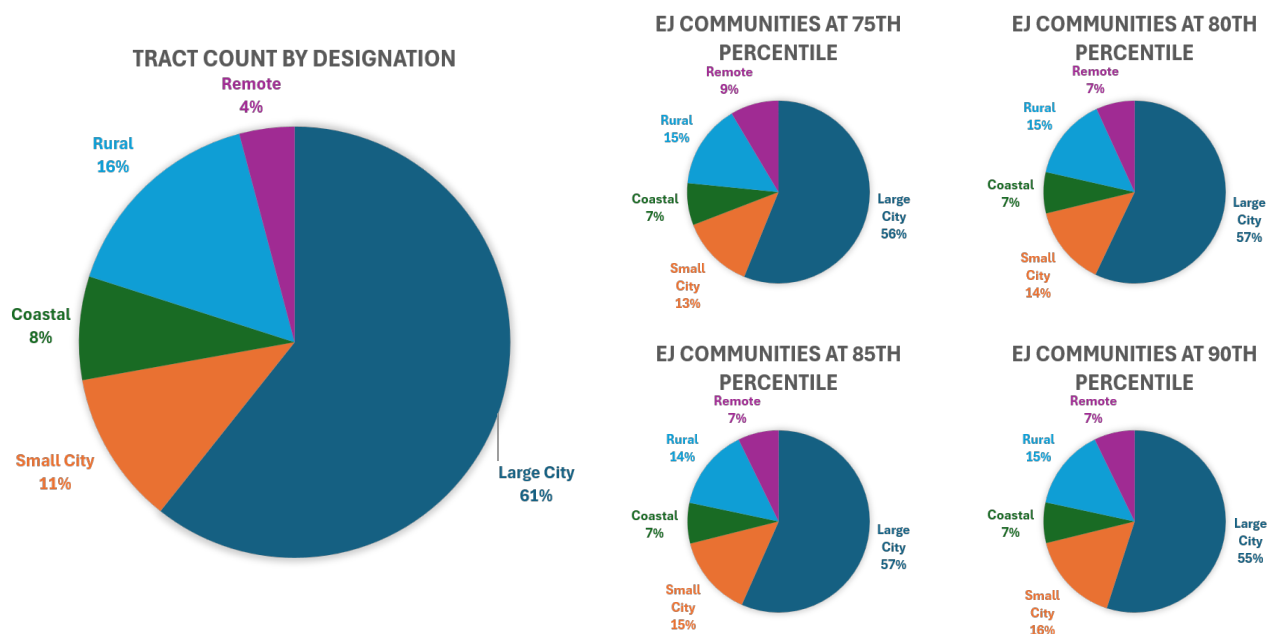
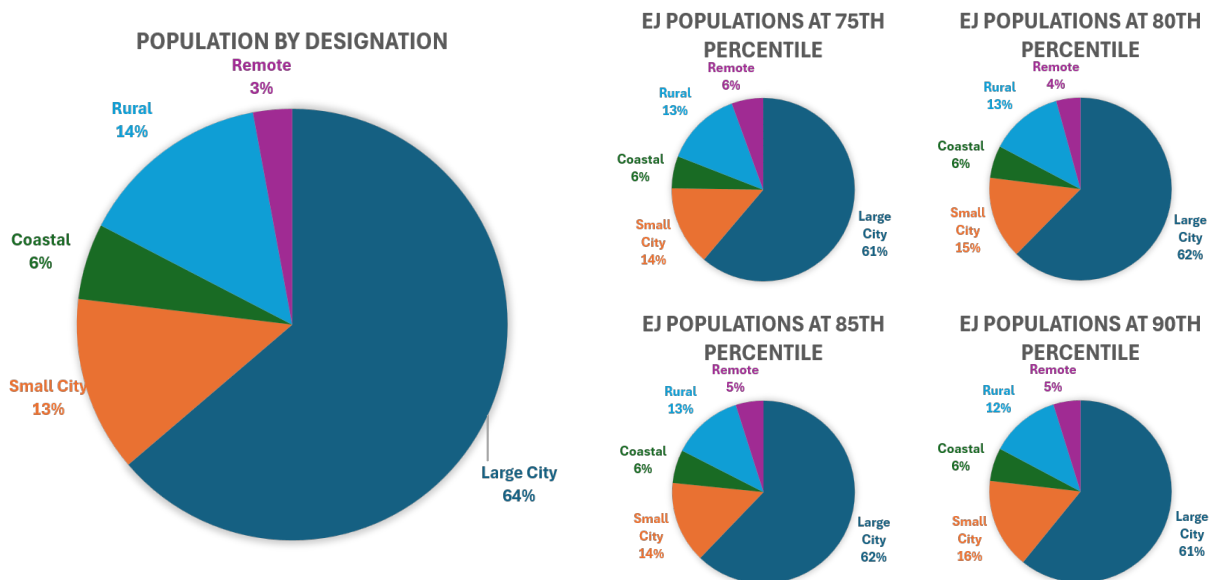


Table 5 shows the number of Oregon residents in each community designation (statewide + designations) that live in EJ community tracts at the four percentiles.

Table 5 EJ Community Populations

Percentile	Large City	Small City	Coastal	Rural	Remote	Total
75th	685,523	157,085	63,653	151,149	62,538	1,119,948
80th	578,756	135,146	53,121	120,390	39,918	927,331
85th	439,982	101,985	41,688	89,021	34,823	707,499
90th	291,593	76,652	28,278	59,509	23,085	479,117

Community Designation Pie Charts: Population by Designation



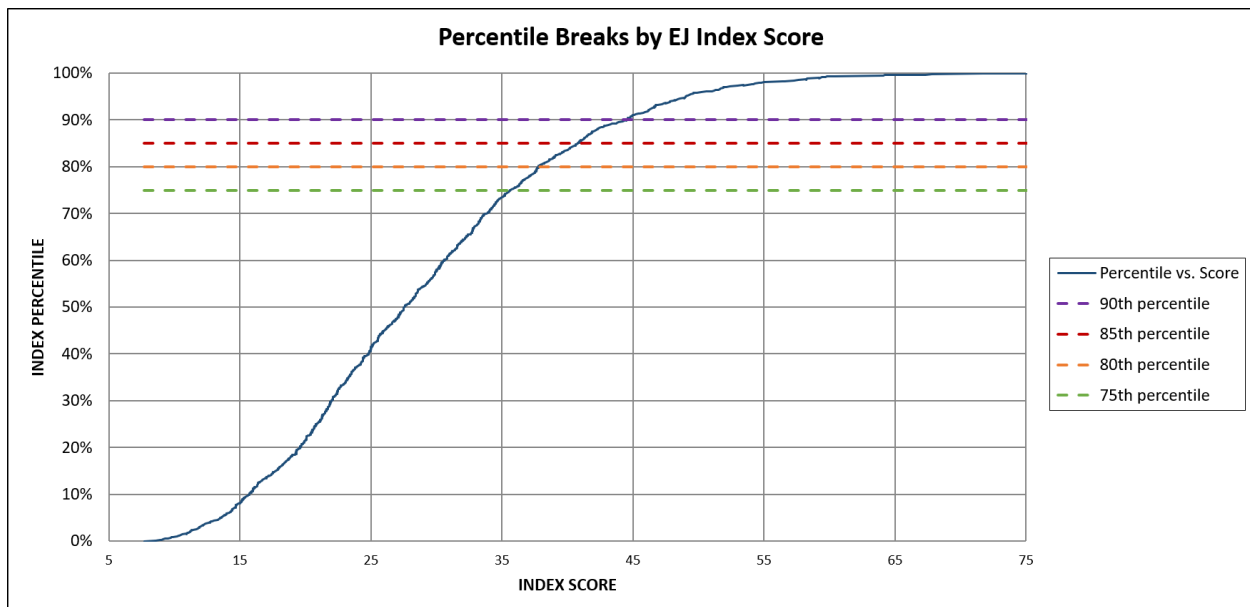
There are a finite number of resources available to support EJ communities and help mitigate conditions that increase health risks and affect quality of life. Table 6 shows a hypothetical scenario where a \$10 million grant is available that must be dispersed equally to all EJ communities. The 85th percentile does not favor a community designation compared to other percentiles.

Table 6

Percentile	Statewide	Large City	Small City	Coastal	Rural	Remote
75 th	\$37,175	\$5,613,383	\$1,301,115	\$743,494	\$1,486,989	\$855,019
80 th	\$45,662	\$5,707,763	\$1,415,525	\$730,594	\$1,461,187	\$684,932
85 th	\$60,241	\$5,662,651	\$1,445,783	\$722,892	\$1,445,783	\$722,892
90 th	\$90,090	\$5,495,495	\$1,621,622	\$720,721	\$1,441,441	\$720,721

The cumulative percentage graph only displays the arc of index scores and percentiles for communities in the statewide index and therefore undercounts the number of tracts that will be picked up using the community designation indices. The steep climb of the slope begins to flatten out right after the 75th percentile. The curve approaches the peak near the 90th percentile. Setting the threshold at the 80th or 85th percentile captures the communities that are transitioning into disproportionately high levels of cumulative burden before the curve hits a point of diminishing returns.

Percentile Breaks by EJ Index Score Graph



OTHER STATE ENVIRONMENTAL JUSTICE COMMUNITY THRESHOLDS

Oregon will have the only state environmental justice mapping tool that includes community designation indices, which means it will identify more Environmental Justice communities than the statewide index alone.

The list below highlights other statewide environmental justice tools and their relevant percentiles.

CalEnviroScreen: 75th percentile or 25% of tracts

Colorado EnviroScreen: 80th percentile

Maryland EnviroScreen: 75th percentile

Massachusetts EnviroScreen: not applicable

Michigan EJScreen: 90th percentile

New Jersey Environmental Justice Mapping Tool: not applicable

Pennsylvania EnviroScreen: 80th percentile

Washington Environmental Health Disparities Map: Rank of 9 or 10 (20% of communities)

Communities Below the EJ Threshold

Regardless of where the environmental justice threshold is set, some communities deserving further consideration by state agencies will remain outside the identified cutoff. The following considerations can inform the Environmental Justice Council's guidance development process.

- What guidance would the Environmental Justice Council like to give users for communities that fall below the EJ threshold, if any?
- Should there be an ultimate cutoff for environmental justice index scores?
- If so, where should the cutoff point be set?

Methodology Workgroup Recommendation

The Methodology Workgroup is not issuing a recommendation on the EJ community threshold decision point but is prepared to offer an opinion if requested.