



Department of
Environmental
Conservation

Climate Justice Working Group Draft DAC Criteria Update

August 26, 2021

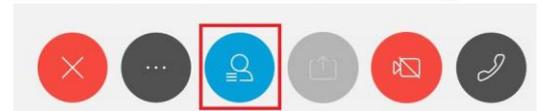
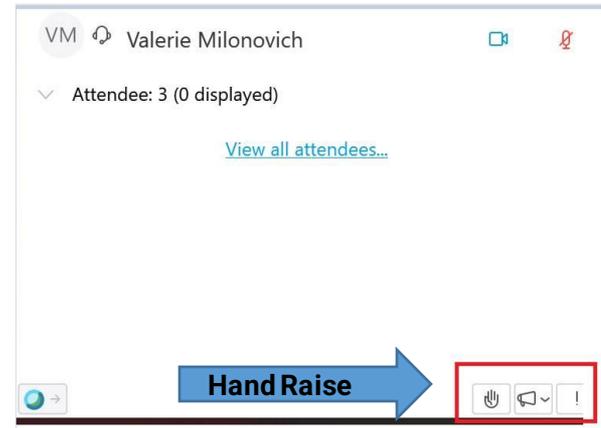
Meeting Procedures

Before beginning, a few reminders to ensure a smooth discussion:

- Working Group Members should be on mute if not speaking.
 - If using phone for audio, please tap the phone mute button.
 - If using computer for audio, please click the mute button on the computer screen (1st visual).
- Video is encouraged for Working Group members, particularly when speaking.
- In the event of a question or comment, please use the hand raise function (2nd visual). Click the participant panel button (3rd visual) for the hand raise function. Rosa or Alanah will call on members individually, at which time please unmute.



You'll see  when your microphone is muted



Welcome and Roll Call



Agenda for August 26

- Introductions
- Prep for Sept 13 CAC meeting
- Barriers Study update and public input session
- DAC Criteria
 - Timeline for Sept/Oct meetings & voting
 - Questions and updates from last meeting
 - Revised scenario to discuss in September
 - Pre-reading for September
- Next Steps



Prep for Sept 13 CAC Meeting



Barriers Study Update



Summary email sent 8/19

- Overview of legislation
- Barriers study research plan
- Public input (can you help us recruit?)
- Your input
- Potential timeline



CLCPA Language

§ 6. Report on barriers to, and opportunities for, community ownership of services and commodities in disadvantaged communities.

1. On or before two years of the effective date of this act, the department of environmental conservation, in cooperation with the New York state energy research and development authority and the New York power authority, with input from relevant state agencies, the environmental justice advisory group, the climate justice working group and Climate Action Council shall **prepare a report on barriers to, and opportunities for, access to or community ownership** of the following services and commodities in disadvantaged communities as identified in article 75 of the environmental conservation law.....
2. The report, which shall be submitted to the governor, the speaker of the assembly and the temporary president of the senate and posted on department of environmental conservation website, shall include recommendations on how to increase access to the services and commodities.
3. The department of environmental conservation **shall amend the scoping plan** for statewide greenhouse gas emissions reductions in accordance with the recommendations included in the report.

Report must be finalized by January 1, 2022



Our interpretation of legislation

Big picture goal:

Develop recommendations for Agencies and other organizations to implement strategies in the scoping plan to improve **access to or community ownership** of services & commodities among DACs

How will it be used?

- Amend the Draft Scoping Plan in 2022
- Strategy/guidance for program implementation



Five Services and Commodities Topics

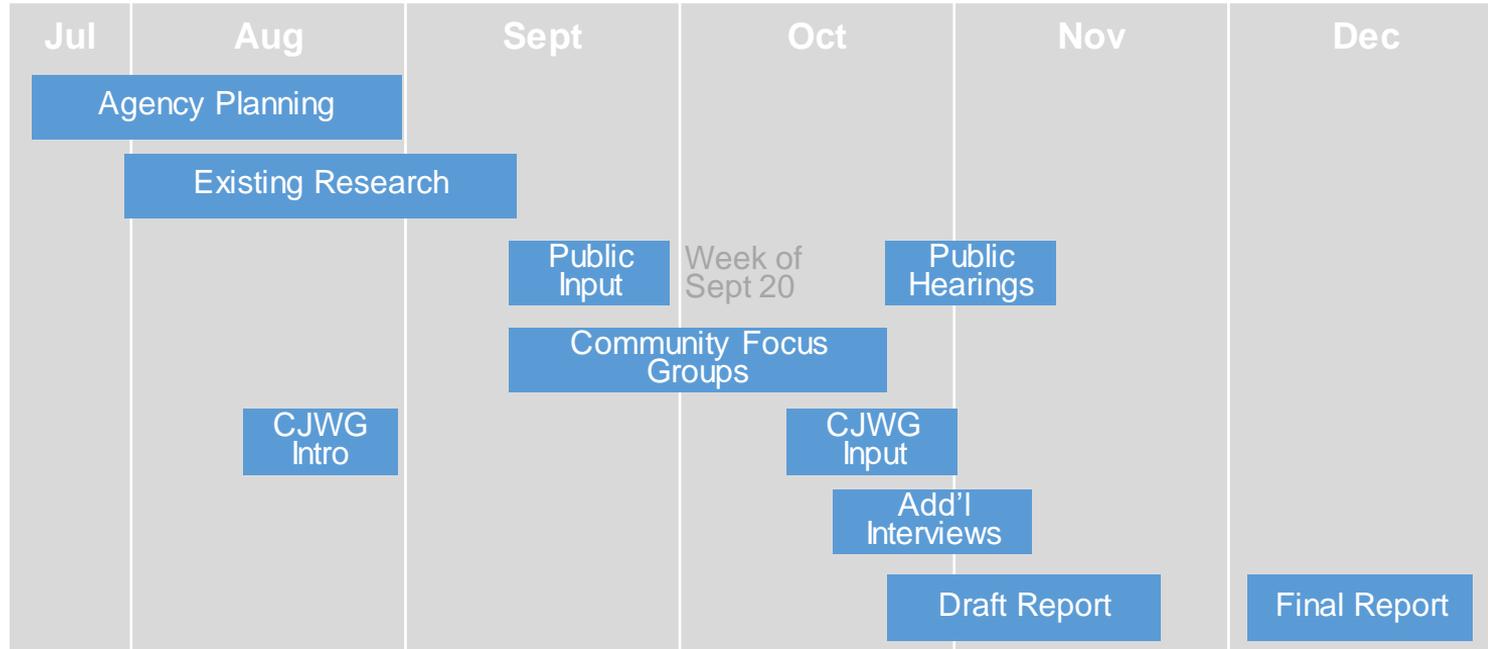
“...prepare a report on barriers to, and opportunities for, **access to and community ownership** of the following services and commodities in disadvantaged communities...”

- Distributed renewable energy generation
- Energy efficiency and weatherization investments
- Zero-emission and low-emission transportation option
- Adaptation measures to improve the resilience of homes and local infrastructure to the impacts of climate change including but not limited to microgrids
- Other services and infrastructure that can reduce the risks associated with climate-related hazards, including but not limited to shelters and cool rooms during extreme heat events; shelters during flooding events; and medical treatment for asthma and other conditions that could be exacerbated by climate-related events



Barriers Study Activities

- Two public input sessions
- 8 focus groups
- Existing Barriers research
- In-depth interviews with market actors
- CJWG input
- State Agency study advisors & workshop



A few ways to get involved (all optional)

Help us hear from community members and CBOs	Provide input on Barriers and Opportunities
<p>A. Spread the word about public input sessions, tentatively scheduled for the week of September 20.</p> <p>B. Spread the word and/or help us recruit for online focus groups</p>	<p>C. Let Sameer know what you see as barriers to, and opportunities for, access to or community ownership – through mid-October</p> <p>D. Review the draft report framework/outline (early Nov)</p>

Sameer is reviewing your input on CAC panel recs to start. We also welcome any research/writing your organization has on specific topics.

More details in August 19 email
Email or schedule check-ins with Sameer anytime



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Sept/Oct DAC Timeline



Draft Timeline

Draft schedule – Doodle poll coming for late
September & October dates

September

Sept 13: CAC meeting

Sept 17*: CJWG meeting –
DAC scenario(s)

Week of Sept 20: Barriers
Study public input session

Sept 30/Oct 1: Prepare for DAC
voting session

*Alternatives to 9/17:

9/14 12:30-2:30pm

9/16 10am-12pm

October

Oct 11-22: DAC scenario
voting

Late Oct: Prep for DAC
public info (educational) and
hearing

Late Oct: Input on Barriers &
Opportunities study

WE ACT Gala: Oct 21

NYC-EJA Anniversary: Oct 29

November

Early Nov: DAC educational
session

Early Nov: Barriers study
public hearings



DAC scenario timeline before voting

- **August 26:** Changes made since last meeting, explain what's driving scores, things we want to test. Preview new scenarios.
 - Pre-read deck to prep for Sept
- **Mid-Sept:** Deep dive into revised scenarios including regional distribution, income discussion, and looking at maps. Prioritize tests/changes before voting.
- **Sept 30/Oct 1:** Review scenarios to vote on; come to consensus on scenarios before voting. CJWG could decide to propose two scenarios for Public Comment.
 - Review scenario(s) to vote on
- **Late October:** Vote on scenarios to post for Public Comment.



Questions for September

Individual:

1. What questions or concerns do you have about the current scenarios, indicators or approach?
2. Are there any additional scenarios/options you'd like to see?

Group Discussion:

1. What will help you feel comfortable with scenarios before the October vote?
2. How many scenarios to post for public comment? (Option to show a “suggested” and/or “alternative” scenario)?

We'll be sending a pre-read deck so thinking of these questions as we review things today will help us know what you'd like us to include in the deck.



DAC Scenario Updates and Changes



Addressing Questions from July

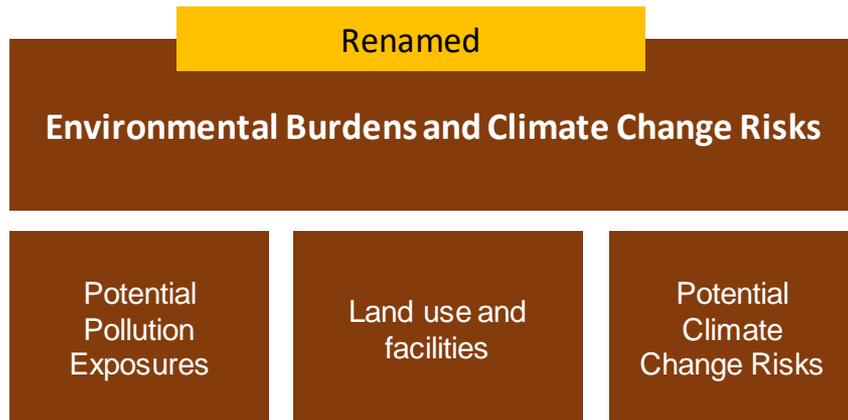
Question/Consideration	What we heard or changed
Income & Race	Make sure scores emphasize Income and BIPOC
Indicator/Factor Contribution	Assess whether scores are adequately representing burdens or vulnerabilities CJWG cares about
Opportunity to Streamline List	Assess whether any indicators can/should be removed (e.g., high correlation with others; over-representing one concept at expense of others)
Income & Race Check	<p>Maps to see if all low-income tracts are included, and if not, why not</p> <p>Analysis/maps to see what would happen if we have a rule to exclude high-income tracts</p>
Tribal/Indigenous Areas	Automatically include 19 tracts where >5% of land is Tribal/Indigenous Reservation or owned by Indigenous Governments



Other Checks and Updates

Question/Consideration	What we hear or changed
Unclear how Burdens and Vulnerabilities components are different	Changed component names to: Environmental Burdens and Climate Change Risks Population Characteristics and Health Vulnerabilities
Ensure that hurricane-vulnerable areas are getting picked up	Double-checked flood and storm risk indicators and confirmed they show those tracts as high-risk, which means that if they don't show up in DAC scenario, it's because other Burdens/Vulnerabilities are not as high Increased relative weight on Climate Change Risks factor
See what tracts have been groundtruthed	Added dots to show tracts you've groundtruthed
Complete indicator list	Added in Low Birthweight from DOH

Indicator Framework Names



Environmental & Climate

Generally “place-based” characteristics or conditions



People & Health

Generally “people” characteristics or conditions



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Flood and Storm Risk

Because some coastal Long Island communities weren't showing up in first draft scenarios, we double-checked flooding/storm risk layers.

The data shows that coastal risk areas are captured by individual indicators. If these communities are not in DAC designation it's related to other factors (e.g., relatively lower environmental burdens or vulnerabilities)



Coastal Flooding and Storm Surge Risk Projections



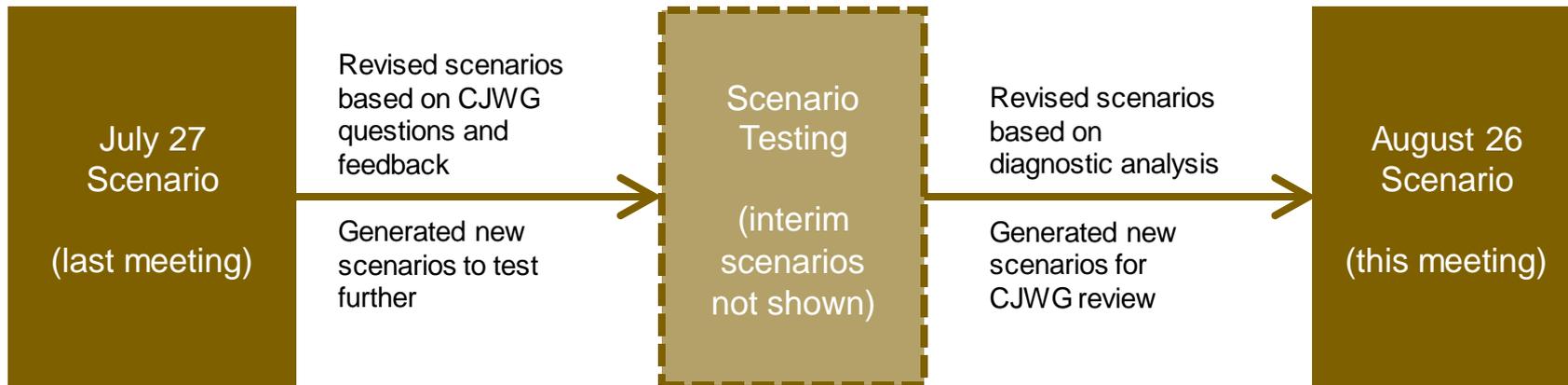
Inland and Riverine Flooding Risk Projections

ORK

OPPORTUNITY

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Scenario changes in response to CJWG questions/feedback and deeper analysis



**What indicators
have more vs.
less influence?**



Understanding What's Driving Scores

same process; nothing new

1. Go through our process of scoring and classifying DACs
(same process you've seen!)

2. Get our list of DACs and Non-DACs

a new way to look at results

3. Look back at what indicators are most correlated with (or predictive of) the DAC designation, *since so many are correlated*

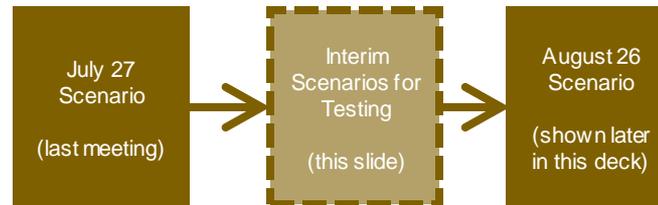
Even though our “recipe” had similar amounts/levels of some things, because some indicators are correlated and some are unique, some end up **more correlated** with final scores





What we learned through scenario testing

- Strongest relationship to prior DAC scenarios:
 - Income, asthma, renters, Pct Latino/a, Pct Black
 - Also high: Single parent, premature deaths, COPD, less than Bachelor's degree, no internet, low birthweight
 - Most of these trend higher in urban areas
- Weaker relationship to prior DAC scenarios:
 - Rural correlates (agricultural land, manufactured/mobile homes, driving time to hospital, age 65+)
 - Proximity to each specific facility type alone (landfill, waste, scrap metal, oil storage, remediation)
 - Climate change risks (esp. coastal and inland flooding)



Conclusions:

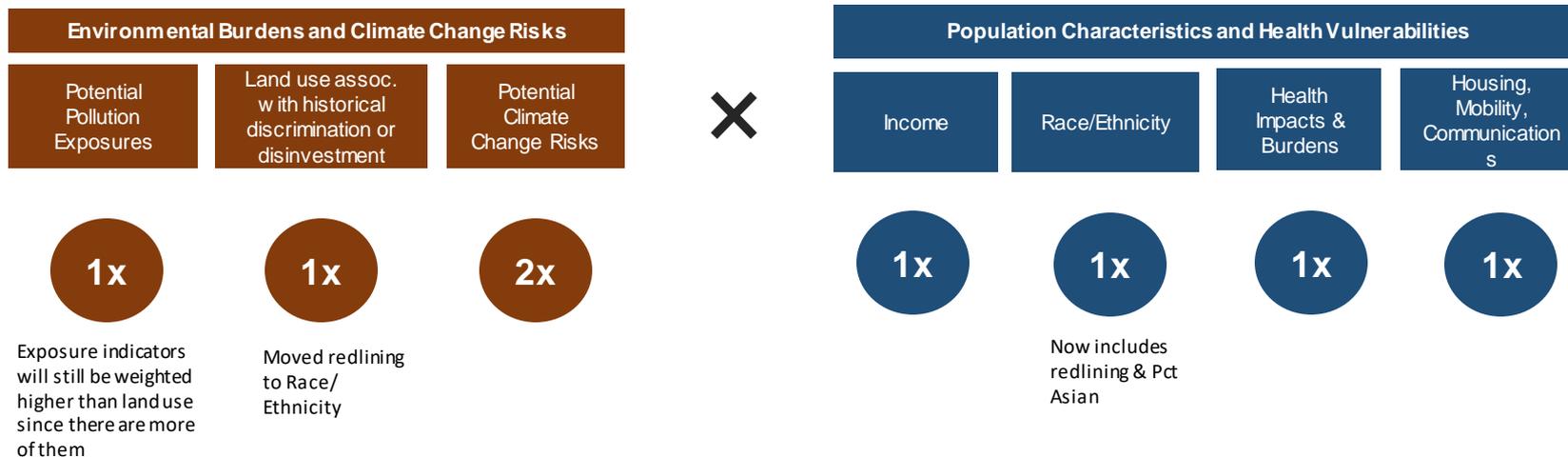
- As expected, scores heavily-driven by income, race, and negative health impacts
- However, we want to make sure we're not missing potential DACs in climate-vulnerable and/or rural areas...and we tested several adjustments

Potential Adjustments we Tested



New scenario uses these factor weights with streamlined indicator list

Equalize sum of environmental burdens with climate change



Note: Since Burdens and Vulnerabilities are multiplied, they have equal influence, regardless of the # of factors or how you weight things within them.



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Should we streamline the indicator list?

Discussed last time:

Having extra indicators can muddy or mute effects of indicators that are more important to you. And starting with fewer indicators may leave more room for changes after public comment.

Other considerations:

With the current factor structure, and approach of weighting factors, it is not essential to completely streamline the variable list.

For today we removed just two indicators and will continue to test removing a couple more.



Environmental Burdens and Climate Change Risks: Suggestions to Streamline

Potential Pollution Exposures

- Vehicle traffic density (candidate for removal)
- Diesel truck and bus traffic
- Particulate Matter (PM2.5)
- Benzene concentration (candidate for removal – 0.87 correlation with PM2.5)
- Wastewater discharge

Land use and facilities associated with historical discrimination or disinvestment

- ~~Historical redlining score (moved to sociodemographics)~~
- Remediation Sites (e.g., NPL Superfund or State Superfund/Class II sites)
- Regulated Management Plan (chemical) sites
- Major oil storage facilities (incl. airports)
- Power generation facilities
- Active landfills
- Municipal waste combustors
- Scrap metal processors
- Industrial/manufacturing/mining land use (zoning)
- ~~Utility/waste land use (zoning) (not needed now that we have all facility indicators)~~
- Housing vacancy rate

Potential Climate Change Risks

- Extreme heat projections (>90° days in 2050)
- Flooding in coastal and tidally influenced areas (projected)
- Flooding in inland areas (projected)
- Low vegetative cover
- Agricultural land
- Driving time to hospitals or urgent/critical care



Population Characteristics and Vulnerabilities: Suggestions to Streamline

Income	Race & Ethnicity	Health Impacts & Sensitivities	Housing, Mobility, Communications
<ul style="list-style-type: none"> • Pct <80% Area Median Income • Pct <100% of Federal Poverty Line • Pct without Bachelor's Degree • Unemployment rate • Pct Single-parent households 	<ul style="list-style-type: none"> • Pct Latino/a or Hispanic • Pct Black or African American • Limited English Proficiency • + Historical redlining score (moved from Land Use) • + Pct Asian 	<ul style="list-style-type: none"> • Asthma ED visits • COPD ED visits • Heart attack (MI) hospitalization • Premature Deaths • Low Birthweight • Pct without Health Insurance • Pct with Disabilities • Pct Adults age 65+ 	<ul style="list-style-type: none"> • Pct Renter-Occupied Homes • Housing cost burden (rental costs) • Energy Poverty / Cost Burden • Manufactured homes • Homes built before 1960 • Percent without private vehicle (remove because correlated with renters) • Pct without Internet (home or cellular)

Within this factor, both income metrics have 2x weight

Within this factor, Pct Latino/a and Pct Black have 2x weight



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Summary of Potential Adjustments

Environmental Burdens and Climate Risks:

- Increased factor weight on Climate Risk
- Increased factor weight on Land use and Facilities since there are more indicators within it, and possibly specific EJ concerns
- Moved historical redlining score to race/ethnicity
- Removed utility/waste related land use since it was contributing little and not needed after addition of specific facilities

Population Characteristics and Health Vulnerabilities:

- Separated income and race/ethnicity into separate factors, and moved Redlining into race/ethnicity
- Within factors: Increased weights on two income metrics, Pct Black and Pct Latino/a
- Removed Pct with No Vehicle (correlated with renters)

If desired, we can detail results of interim diagnostic analysis and rationale for adjustments in the Sept 17 pre-read deck (forthcoming)

Scenario results with these adjustments



Regional Distribution – August 26

In this scenario, 31% of all tracts are DACs, ranging from 9% in North Country to 39% in NYC



% Region Designated DAC

Region	S1 %DAC
New York City	39%
Long Island	11%
Mid-Hudson	39%
Western NY	32%
Finger Lakes	31%
Capital Region	21%
Central NY	32%
Southern Tier	19%
Mohawk Valley	21%
North Country	9%
Grand Total	31%

Other Diagnostics – August 26

S1 Means - DACs v Non

	DAC	Non DAC
<80% AMI	65%	36%
<100% FPL	25%	9%
Black & African ..	33%	11%
Latino/Latina	34%	11%
Asian	7%	11%
Burden Score	52	47
Vulnerability Sc..	67	38

Comparison of attributes of tracts that are designated DACs in this scenario

DAC tracts have a higher average proportion of their population below the federal poverty line (FPL) than non-DAC census tracts

Agreement with Groundtruthing

S1 % Agreement	65%
S1 % Agreement (Should be DAC)	57%
S1 % Agreement (Shouldn't be DAC)	80%

Percent agreement based on groundtruthing input

% agreement = **Overall agreement**

% agree that it should be a DAC = **Overlap when WG member says it's a DAC and scenario says it's a DAC**

% agree that it should not be a DAC = **Overlap of when WG member says it is NOT a DAC and scenario says it is NOT a DAC**



Income Analysis in Tableau

Want to ensure that most low-income tracts are included

Analysis of **low-income non-DACs** in Tableau –

How many census tracts with very low income currently excluded? Where/who are they?

Understand if we should have a rule to exclude high-income tracts

Analysis of **high-income DACs** in Tableau –

How many census tracts with high income are currently excluded? If we excluded them, would this kick out high-BIPOC communities, or communities with unique burdens or vulnerabilities?

Why Two Income Measures?

Both included income metrics, <100% of Federal Poverty Line and <80% of Area Median Income, are indexed to household size.

The Federal Poverty Line is lower, but the same nationally.

Area Median Income is higher, and indexed to metropolitan areas or fair market rent areas



Example Income Thresholds

Both included income metrics, <100% of Federal Poverty Line and <80% of Area Median Income, are indexed to household size. The Federal Poverty Line is lower, but the same nationally. Area Median Income is higher, and indexed to metropolitan areas or fair market rent areas.

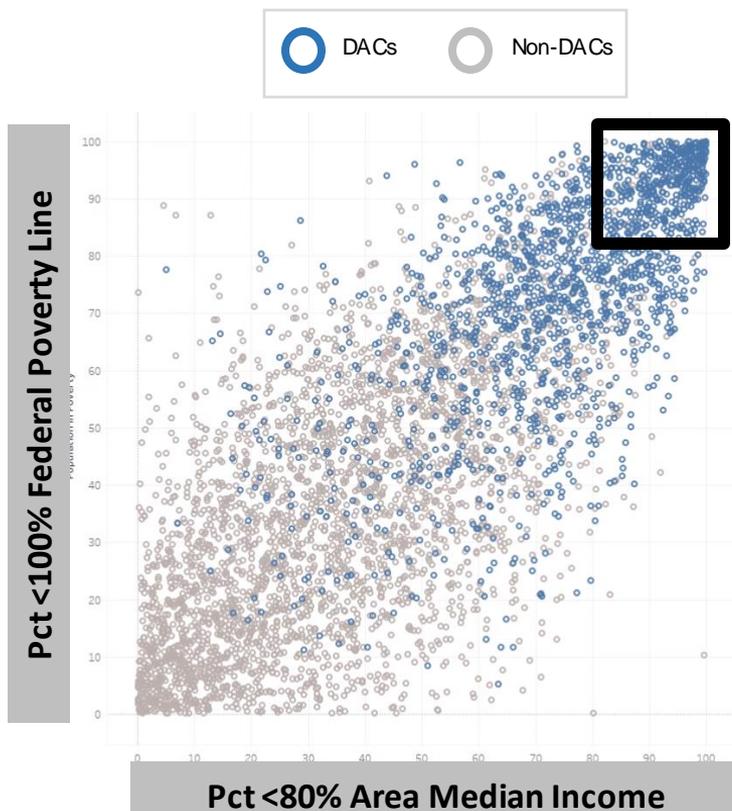
Location (Examples)	2-person household	
	100% of Federal Poverty Line*	80% of Area Median Income**
Albany-Schenectady-Troy, NY MSA	\$17,420	\$61,200
New York, NY HUD Metro FMR Area	\$17,420	\$76,400
Buffalo-Cheektowaga-Niagara Falls, NY MSA	\$17,420	\$50,500
Nassau-Suffolk, NY HUD Metro FMR Area	\$17,420	\$75,950
Lewis County, NY	\$17,420	\$44,400
Clinton County, NY	\$17,420	\$46,000
Poughkeepsie-Newburgh-Middletown, Metro	\$17,420	\$63,950



*2021 Federal Poverty Level. Source: <https://www.healthcare.gov/glossary/federal-poverty-level-fpl/>

** 2021 AMI. Source: <https://www.huduser.gov/portal/datasets/il/il21/Section8-IncomeLimits-FY21.pdf>

Where are the non-DACs with lower income?



Lowest-income tracts

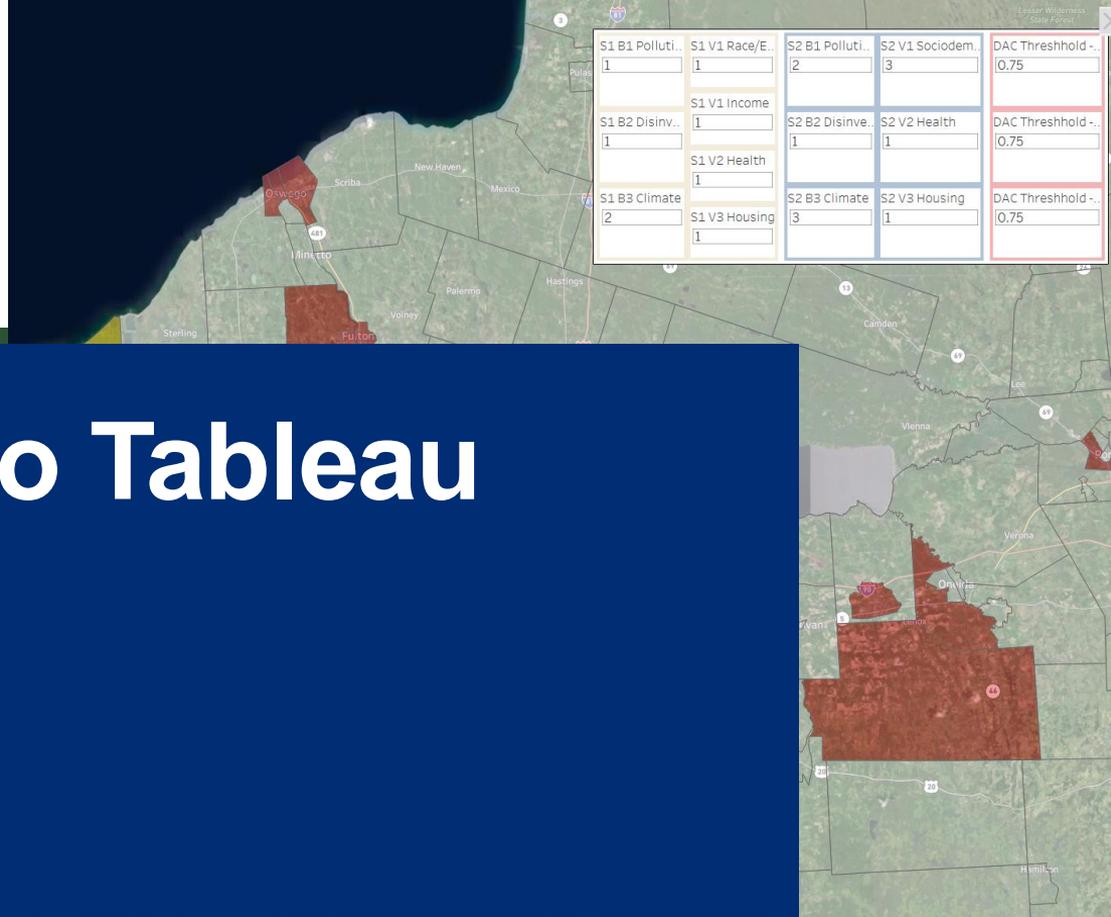
Who are the non-DACs in this group?

Go to Tableau

S1 B1 Polluti..	S1 V1 Race/E..	S2 B1 Polluti..	S2 V1 Sociodem.	DAC Threshold ..
1	1	2	3	0.75
S1 B2 Disinv..	S1 V1 Income	S2 B2 Disinv..	S2 V2 Health	DAC Threshold ..
1	1	1	1	0.75
S1 B3 Climate	S1 V2 Health	S2 B3 Climate	S2 V3 Housing	DAC Threshold ..
2	1	3	1	0.75

% Region Designated DAC		Agreement with Groundtruthing	
Region	S1 %..	S2 %..	
New York City	39%	40%	S1 % Agreement
Long Island	11%	12%	S1 % Agreement (Should be DAC)
Mid-Hudson	39%	39%	S1 % Agreement (Shouldn't be DAC)
Western NY	32%	31%	S2 % Agreement
Finger Lakes	31%	30%	S2 % Agreement (Should be DAC)
Capital Region	21%	20%	S2 % Agreement (Shouldn't be DAC)
Central NY	32%	32%	S1 % Tracts are DACs
Southern Tier	19%	19%	S2 % Tracts are DACs
Mohawk Valley	21%	20%	rural # rural
North Country	9%	8%	suburban # suburban
Grand Total	31%	32%	urban # urban
			Grand Total #

	S1 Means - DACs v Non		S2 Means - DACs v Non		Grand Total
	DAC	Non DAC	DAC	Non DAC	
<80% AMI	65%	36%	65%	36%	4
<100% FPL	25%	9%	25%	9%	1
Black & African ..	33%	11%	33%	11%	1
Latino/Latina	34%	11%	34%	10%	1
Asian	7%	11%	7%	10%	
Burden Score	52	47	53	46	
Vulnerability Sc..	67	38	66	38	



What happens if we increase the designation threshold?

Designation Threshold

(High-scoring tracts to designate as DACs – e.g., top third?)



https://www.clrp.comell.edu/q-a/272-excavator_certification.html

Factor Importance

(Relative importance of exposures vs. climate, etc.)



<https://compactequip.com/excavators>

Indicators

(With ~40 indicators, changing one doesn't shift much)



Photo by Andres Siimon on [Unsplash](#)

Indicator Weights

(With highly-correlated indicators, weights don't shift results much)



Photo by Anaya Katlego on [Unsplash](#)

What happens if we increase the designation threshold?

25% of regional + 25% of statewide models

% Region Designated DAC		% Tracts are DACs	
Region			
New York City	39%	rural	8%
Long Island	11%	suburban	23%
Mid-Hudson	39%	urban	44%
Western NY	32%	Grand Total	31%
Finger Lakes	31%		
Capital Region	21%		
Central NY	32%		
Southern Tier	19%		
Mohawk Valley	21%		
North Country	9%		
Grand Total	31%		

Means - DACs v Non

	DAC	Non DAC	Grand Total
<80% AMI	65%	36%	45%
<100% FPL	25%	9%	14%
Black & African American	33%	11%	18%
Latino/Latina	34%	11%	18%
Asian	7%	11%	9%
Burden Score	52	47	49
Vulnerability Score	67	38	47

Agreement with Groundtruthing

S1 % Agreement	65%
S1 % Agreement (Should be DAC)	57%
S1 % Agreement (Shouldn't be DAC)	80%

33% of regional + 33% of statewide models

% Region Designated DAC		% Tracts are DACs	
Region			
New York City	53%	rural	16%
Long Island	19%	suburban	33%
Mid-Hudson	50%	urban	56%
Western NY	40%	Grand Total	42%
Finger Lakes	42%		
Capital Region	26%		
Central NY	40%		
Southern Tier	26%		
Mohawk Valley	28%		
North Country	19%		
Grand Total	42%		

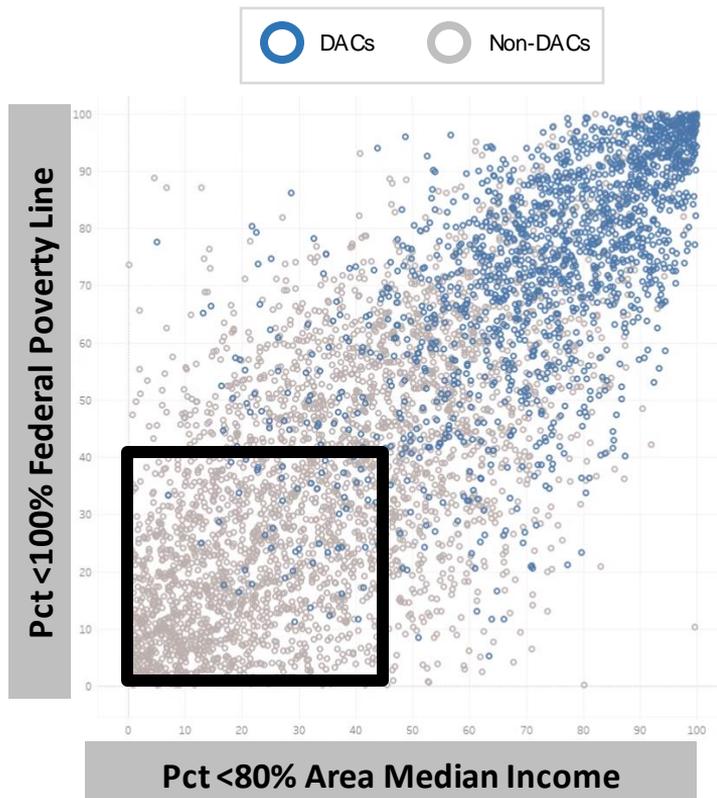
Means - DACs v Non

	DAC	Non DAC	Grand Total
<80% AMI	61%	33%	45%
<100% FPL	23%	8%	14%
Black & African American	30%	9%	18%
Latino/Latina	30%	9%	18%
Asian	9%	10%	9%
Burden Score	52	46	49
Vulnerability Score	63	35	47

Agreement with Groundtruthing

S1 % Agreement	72%
S1 % Agreement (Should be DAC)	73%
S1 % Agreement (Shouldn't be DAC)	65%

Are there any high-income DACs? What would happen if we excluded them?



This quadrant is higher-income tracts.
There are not many higher-income DACs. We started to look at them and in most cases they have higher environmental burdens and/or climate risks and it may be reasonable to leave them.

Things to think about

Regional Distribution: Does it seem fair?

Income: We're seeing that some low-income areas have low burden scores and are therefore not DACs.

Should more low-income tracts be included as DACs? We could do this by increasing the threshold to include more tracts as DACs.

New Approach: Do we have buy-in for the new framework approach?

- Giving climate the same weight as environmental burdens combined
- Created separate factors for race and income



Preparation for September DAC Work

Read the pre-read deck we'll send via email

Reach out to DEC and Illume with questions/ideas



Appendix: Review of Approach

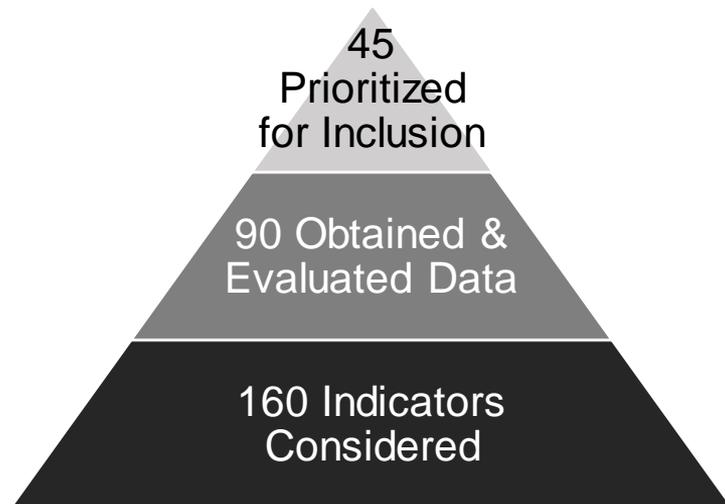


Inclusion Considerations

Inclusion decisions consider:

- Data coverage & granularity
- Data quality (e.g., measurement or sampling error)
- Modeled vs. directly-collected or measured data
- Correlations
- Technical guidance (e.g., DEC, DOH, DOS)

So far, we obtained & evaluated data for 90+ indicators (a) on their own, and (b) in combination



Annual Update Process

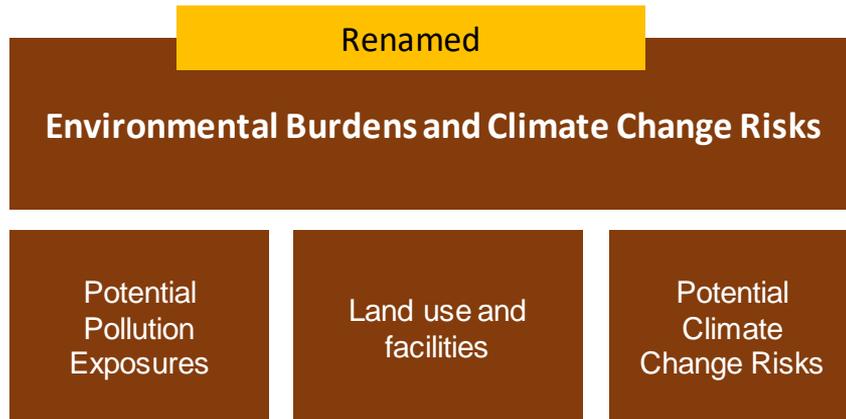
Document what CJWG and staff team want to improve
(future data collection or advanced analysis)

Additional data needs may emerge from public comment –
Save time/budget to address

CJWG can recommend annual process to review and improve
indicators (*← what do you recommend?*)



Indicator Framework Names



Environmental & Climate

Generally “place-based” characteristics or conditions



People & Health

Generally “people” characteristics or conditions



Environmental Burdens and Climate Change Risks

22 Indicators in July Draft Scenario

July draft indicator list
– May change based
on August analysis

Potential Pollution Exposures

- Vehicle traffic density
- Diesel truck and bus traffic
- Particulate Matter (PM2.5)
- Benzene concentration
- Wastewater discharge

Land use and facilities associated with historical discrimination or disinvestment

- Historical redlining score
- Remediation Sites (e.g., NPL Superfund or State Superfund/Class II sites)
- Regulated Management Plan (chemical) sites
- Major oil storage facilities (incl. airports)
- Power generation facilities
- Active landfills
- Municipal waste combustors
- Scrap metal processors
- Industrial/manufacturing/mining land use (zoning)
- Utility/waste land use (zoning)
- Housing vacancy rate

Potential Climate Change Risks

- Extreme heat projections (>90° days in 2050)
- Flooding in coastal and tidally influenced areas (projected)
- Flooding in inland areas (projected)
- Low vegetative cover
- Agricultural land
- Driving time to hospitals or urgent/critical care



Population Characteristics and Vulnerabilities

23 Indicators in July Draft Scenario

July draft indicator list
– May change based
on August analysis

Sociodemographics

- Pct <80% Area Median Income
- Pct <100% of Federal Poverty Line
- Pct without Bachelor's Degree
- Unemployment rate
- Pct Single-parent households
- Pct Latino/a or Hispanic
- Pct Black or African American
- Limited English Proficiency

Health Impacts & Sensitivities

- Asthma ED visits
- COPD ED visits
- Heart attack (MI) hospitalization
- Premature Deaths
- Low Birthweight
- Pct without Health Insurance
- Pct with Disabilities
- Pct Adults age 65+

Housing, Mobility, Communications

- Pct Renter-Occupied Homes
- Housing cost burden (rental costs)
- Energy Poverty / Cost Burden
- Manufactured homes
- Homes built before 1960
- Percent without private vehicle
- Pct without Internet (home or cellular)



Review: Combining Data

Group Indicators into Factors



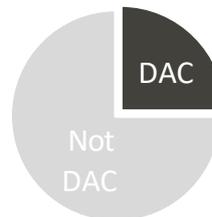
Combine Factors into Components



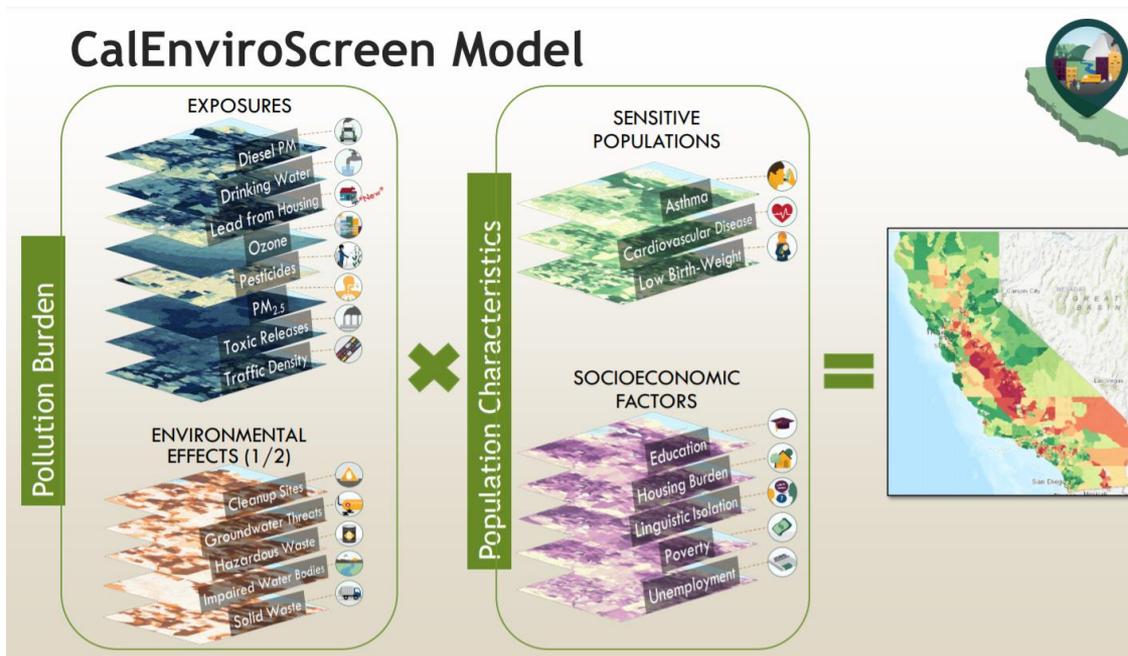
Calculate Statewide & Regional Scores



Designate DACs based on their relative score



Multiply to represent that Vulnerabilities serve as Effect Modifiers to Burdens



DRAFT Designation Approach

Statewide Score

How each community ranks (on all of the data) within the **entire** state



Regional Scores

How each community ranks (on all of the data) in NYC and Rest-of-State separately



About 1/3 designated

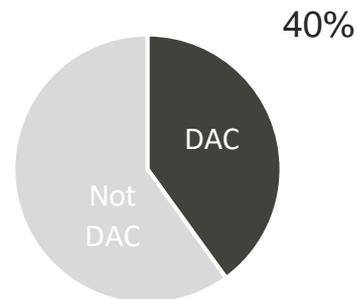
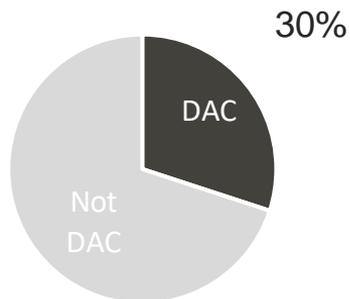
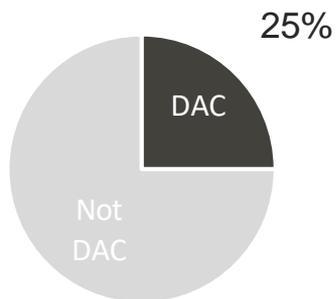
Designate communities that score in either top 25% **statewide** OR **regionally**



Department of
Environmental
Conservation

Critical Question for CJWG: Share of DACs

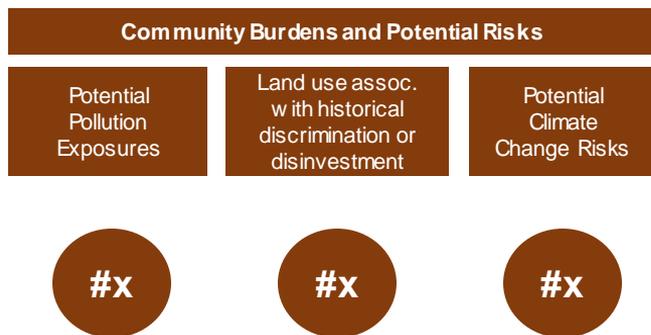
In general, what share of communities (census tracts) should be designated as DACs?



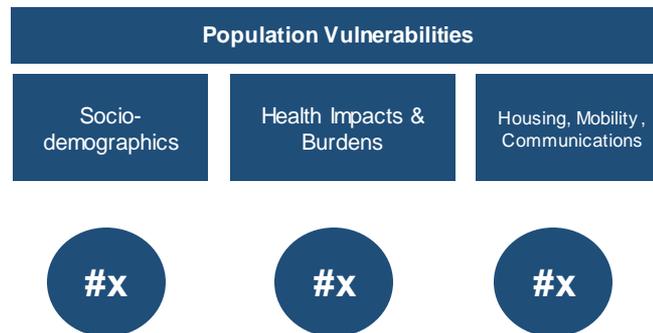
We've discussed the idea of "leave no DAC behind", but we need to operationalize this as the final % will be an arbitrary number.

Factor weights have influence on scores

Example from July 2021



×



Tribal and Indigenous Areas

Census Tract	County	Census Place Name	Nation	Land	Pct of Tract Land Area
36009940200	Cattaraugus		Seneca Nation	Reservation	100%
36029940100	Erie		Tonawanda Seneca	Reservation	100%
36003940200	Allegany		Seneca Nation	Reservation	100%
36033940000	Franklin	Akwesasne CDP	Saint Regis Mohawk Tribe	Reservation	100%
36067940000	Onondaga	Nedrow CDP	Onondaga Nation	Reservation	99%
36037940100	Genesee		Tonawanda Seneca	Reservation	99%
36063940001	Niagara		Tuscarora Nation	Reservation	99%
36009940300	Cattaraugus	Salamanca city	Seneca Nation	Reservation	99%
36009940000	Cattaraugus		Seneca Nation	Reservation	99%
36029940000	Erie		Seneca Nation	Reservation	99%
36063940100	Niagara		Tonawanda Seneca	Reservation	98%
36013037600	Chautauqua	Forestville CDP	Seneca Nation	Reservation	6%
36103159511	Suffolk	Mastic CDP	Unkechaug Nation	Reservation	6%
36103190705	Suffolk	Tuckahoe CDP	Shinnecock Nation	Reservation	6%
36099950300	Seneca	Seneca Falls CDP	Cayuga Nation	Ow ned	13%
36053030103	Madison	Oneida city	Oneida Nation	Ow ned	10%
36053030300	Madison	Canastota village	Oneida Nation	Ow ned	7%
36063021100	Niagara	Niagara Falls city	Seneca Nation	Ow ned	7%
36053030600	Madison	Munnsville village	Oneida Nation	Ow ned	6%

Tribal and Indigenous Nation Lands if:

- Tract contains >5% federally-designated reservation territory (Source: Census)
- Tract contain >5% of nation-owned land (Source: NYS parcel ownership data)



Low-Population Areas

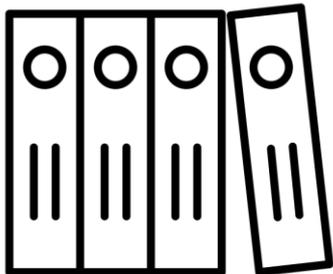
138 of 4,918 tracts (2.8%) have populations that are too low for reliable “people” data (<300 households or <500 people, compared with ~1,500 households and ~4,000 people average per tract)

We will examine their Burdens score and will include them on the basis of Burdens alone (if their Burdens score fall in the top 25% statewide or top 25% for NYC or Rest-of-State)

NOT INCLUDED IN MAPS YET



Indicator Limitations



Documentation (for public comment) will discuss:

- Indicators/data we **considered** but did not pursue, and why
- Data limitations, including Census (e.g., not specific enough to race/ethnicity), public health data (e.g., limited data @ sub-county level), and more
- Recommendations for future/additional community-level data (e.g., migration)
- Potential for periodic indicator review/updates

Legislation allows for continuous improvement

We are cataloging recommendations for data to gather, if possible, and consider in the future.

