

# ENVIRONMENTAL JUSTICE FRAMEWORK



June 2022

# The Council's mission is to foster efficient and economic growth for a prosperous metropolitan region

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The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governor.

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# Environmental Justice and Climate Action

## Met Council definition of environmental justice

The Met Council defines environmental justice (EJ) in relation to Council roles and responsibilities to advance climate action in policy making, planning, and the provision of regional services:

*Environmental justice* aims to improve environmental outcomes for Black and Indigenous households, communities of color, and people with low incomes that have been disproportionately harmed by environmental pollution and climate change impacts. Environmental justice seeks to address these issues through equitable engagement, thoughtful policy creation, and public service delivery that is focused on improving environmental conditions and enhancing climate resilience.

*Racial equity* is the condition when race no longer predicts a person's quality of life outcomes in our community.

## What is an environmental justice framework?

An environmental justice framework includes assessment tools and approaches to mitigate unjust and inequitable decisions and conditions. A framework assesses and reviews projects or tools used for planning public policy planning, including engagement, but may also be used during or after project or policy implementation, including evaluation. A successful framework aims to uncover underlying actions that may contribute to and produce disparate exposure and unequal protection from environmental hazards.

## Why is the Council incorporating environmental justice into its Climate Action Plan (CAP)?

Historic policies and practices have contributed to wide disparities among low-income households, immigrant, and communities of color — especially Black and Indigenous residents — across our region.

Redlining, for example, was a discriminatory practice that classified neighborhoods with higher numbers of racial and ethnic minorities as 'hazardous' for loan guarantees, causing declines in property values and community investment ([Citation](#)). In many cases, heavily polluting land uses were and still are located next to low-income households in our region, and these local residents are predominantly Black, Indigenous, and people of color. Similarly, low-income households often move to areas that are already heavily polluted due to lower property value costs ([Citation forthcoming](#)).

There is a strong correlation between redlined communities and the location of urban interstates, which disrupt local connectivity, degrade air quality, and further decrease property values ([Citation forthcoming](#)).

The United States has a history of ongoing environmental racism. The Minnesota statewide percentage change of living near facilities with pollution levels above health guidelines is 6%. The change increases to 9% for low-income communities and more than doubles to 14% to communities of color. Such emissions cause air pollution-related risks that endanger the health of our region's communities. 46% of low-income communities are at risks above health guidelines while the rate is 91% for communities of color. In fact, the Minnesota Pollution Control Agency reports that as of 2008, between 2 and 13 percent of residents experienced heart and lung problems, and sometimes death, "because of fine particles in the air of ground-level ozone", which "roughly translates to about 2,000 deaths, 400 hospitalizations, and 600 emergency room visits."

Climate change and any activity that contributes to climate change have damaging effects on communities. By seeking to achieve environmental justice outcomes, we acknowledge that communities that are disproportionately affected by climate change hazards are already struggling with existing environmental concerns.

All residents in our region will be affected by climate change, but we are not all affected in the same way. Those who are already vulnerable due to a range of historical, social, environmental, and economic factors have less ability to prepare for, deal with, or recover from climate change impacts ([Citation](#)). Some in our region have greater access to decision-making processes around climate change solutions. These, and other forms of inequity, can make our region less prosperous and less resilient for all.

Through an environmental justice lens, climate action can help reverse the impacts of these historic and current practices and work toward racial and economic equity, thereby building resilience.

A focus on equity and environmental justice also ensures the fair distribution of the costs and benefits associated with the actions within the CAP, including those of future generations. This acknowledgement also includes the need to allow for meaningful participation that recognizes past and current environmental harms for many of our residents.

Resilience is having the capacity to respond, adapt, and thrive in response to chronic stresses and acute shocks. Impacts of climate change will have a disproportionate effect on vulnerable populations, infrastructure that has not been maintained, and natural systems that are degraded or fragmented.

Understanding and identifying vulnerabilities allows us to plan and prepare for future events and strengthen community resilience.

- **People** are impacted differently by climate hazards. The ability to recover from an event may depend on a variety of factors including demographic characteristics, health, physical abilities, social cohesion, and existing systemic factors.
- **Built infrastructure** includes elements related to transportation (roads, bridges, public transportation, and active mobility), and critical infrastructure (emergency services, energy systems, and water treatment facilities).
- **Natural infrastructure** like trees, native plants, water, and ecosystems are simultaneously susceptible to climate hazards and help to improve the resilience of a city or neighborhood, while also acting to capture and retain carbon.

This framework seeks to address environmental injustice by acknowledging and addressing past and ongoing environmental harm in the creation, engagement, and implementation of the Council's climate action work. By doing so, we support the Council's original and renewed mission of environmental stewardship and economic competitiveness for the region.

## **What is the intersection of Council climate work with environmental justice?**

The Council's work affects the environment. The Council was created in 1967 to respond to environmental quality issues and to address pollution. A large portion of the Council's work has been to ensure good environmental stewardship. Consideration of environmental justice will add value and depth to the Council's climate work. It allows us to assess past and ongoing environmental harm in engagement, creation of our tools, implementation of our projects, and in our decision-making processes. This new approach will facilitate changes to our processes and standard operating procedures.

The Environmental Justice (EJ) framework will play a key role in achieving Thrive MSP 2040's defined outcomes. Thrive2040 envisions a future in which Met Council stewards a prosperous, equitable, livable, and sustainable region. The EJ Framework can help the Council achieve each of these outcomes, and it particularly supports a vision for sustainability and equity in Council climate operations and planning services.

The EJ Framework provides a natural extension and synthesis of Thrive2040's equity and sustainability outcomes. The Climate Action Plan itself works toward organizational sustainability and provides an initial pathway for achieving Thrive's goals related to climate change (Thrive p. 61). However, without centering equity and environmental justice, the CAP runs the risk of exacerbating existing environmental inequities rather than repairing them. The EJ Framework facilitates a process in which the Council can assess the equity implications of the Climate Action Plan while aligning with Thrive2040's goal to advance equity in the region.

Environmental justice makes our communities more livable and equitable; balanced economic development ensures that each community receives the resources it needs to prosper. When communities that have been harmed by environmental racism and disinvestment benefit directly and equitably from climate change mitigation initiatives, stewardship, resiliency, livability, and prosperity increases throughout the region.

The Council can utilize influence and investments to build a more equitable region by integrating the EJ framework into Council climate operations. An EJ framework encourages Council climate operations and planning to engage a full cross-section of the region's diversifying communities. An EJ framework also assists in planning for equitable investments in communities that have been harmed by chronic private disinvestment. Environmental justice is crucial in helping the region reach its full economic potential by providing residents most impacted by climate change improved opportunities for health, prosperity, and quality of life.

Sustainability is an important part of environmental justice. An EJ framework allows the Council to provide information and technical assistance to equitably support climate change mitigation, adaption, and resilience throughout the region. Environmental justice in Council climate operations and actions ensure that all communities receive the appropriate amount of assistance and resources to maintain sustainability and resiliency.

# The Environmental Justice Framework

## Limitations of this environmental justice framework

Best practice for the scoping and creation of a successful environmental justice framework is rooted in engagement and co-creation with affected communities.

Given time constraints and limited capacity, this framework was created in the absence of front-end community engagement. It is important to acknowledge this shortcoming at the outset because meaningful engagement is a critical component of successful environmental justice work. The EJ Framework is being developed with input from a select group of peer reviewers who are local EJ practitioners; however, this peer review process is not a substitute for robust community engagement.

To alleviate the effect of this limitation, the Met Council commits to meaningful engagement with environmental justice and vulnerable communities in the implementation of the strategies and actions within the Climate Action Plan. The framework will also ultimately include best practices on engagement with local communities to ensure that such practices become embedded into our environmental justice and climate work.

## EJ Framework application timeline for the Climate Action Plan

*Component 0 – Peer Review of EJ Framework – July-August 2022*

*Component 1 – Strategic assessment of the CAP - Complete by September 2022*

*Component 2 – Implementation of CAP actions - January/February 2023*

*Component 3 – Evaluation of EJ implementation - Begin Spring of 2023, ongoing*

*Component 4 – EJ Guidance - Ongoing*

## How will the environmental justice framework be applied to the Climate Action plan?

This environmental justice framework consists of five components:

### Component 0 – Peer Review of the EJ Framework

The EJ Task Force identifies 4-6 peer reviewers to assess the EJ Framework. Reviewers are local EJ professionals from government, academic, and non-profit sectors who are familiar with Met Council.

Peer Reviewers assess the EJ Framework and make recommendations about this document's approach to assessing the CAP. The Framework will then be revised based on Peer Review feedback.

### Component 1 - Strategic assessment of the CAP

The EJ framework will then be applied to the draft CAP using the following assessment process:

1. The EJ Task Force will use an EJ Scorecard to quantitatively score the CAP actions
2. The EJ Task Force will concurrently conduct a qualitative assessment of the CAP using the EJ decision-making questions and considerations outlined below.
3. The assessment results will be incorporated into CAP recommendations and revisions as necessary

### Component 2 – Assess implementation of CAP actions

The framework will be applied to the action items within the Climate Action Plan using the following implementation process:

1. Apply place-based or geographic EJ screening for certain CAP implementation actions
2. Assess equitable allocation of benefits, while reducing harm, following EJ geographic screening process
3. Develop communications and engagement plans associated with CAP actions. Plans will be informed by Steps 1 and 2.

### **Component 3 – Evaluate EJ implementation**

Evaluate EJ Framework progress and determine if it met goals, note any lessons learned, and identify gaps.

### **Component 4 – EJ Guidance**

The EJ Task Force will create guidance in the form of an EJ inventory of policies, history, resources, and best practices to enhance subject matter expertise and EJ application with Council climate work.

## **Component Details**

### **Component 0 – Peer Review of the EJ Framework**

The EJ Task Force will identify 4-6 peer reviewers to assess the EJ Framework. These reviewers are local EJ practitioners from the public, academic, and non-profit sectors who are familiar with Met Council.

The peer reviewers will assess the EJ Framework itself and make recommendations about this document's approach to assessing the CAP through an EJ lens.

The EJ Framework team will then revise the EJ Framework to incorporate feedback from the peer review process.

### **Component 1 - Strategic EJ assessment of the CAP**

#### **Phase 1 – Apply EJ Scorecard to CAP**

EJ Task Force members (and possibly CAP leadership) team will each evaluate the CAP using the EJ scorecard.

1. Utilize the EJ scorecard to apply an environmental justice lens to the strategies and actions within the CAP.
2. Compile results of scorecard assessments to flag CAP matrix actions for review.

#### **Phase 2 – Conduct qualitative assessment of CAP**

EJ Task Force team members (and possibly additional CAP members) will use these questions to review the CAP from a qualitative perspective.

#### *Questions by Topic Area [Currently Brainstormed List]*

##### *Data*

1. What regional ethnic/racial disparities exist related to climate change and environmental racism?
2. Does the CAP consider both quantitative and qualitative (stories, experiences) data sources? Where are these data sources, both qualitative and quantitative, coming from? How was this data gathered?

3. What are the environmental justice concerns that affect communities?
4. How do the above intersect with climate hazards (if known)?

*(Based on regional data, where do you see disparate outcomes related to the implementation of CAP strategies/actions?)*

### Engagement

5. How does the CAP engage local stakeholders or community members during the planning and implementation stages associated with strategies/actions?

*(Describe your plan to work with local stakeholders or residents who might be impacted by the CAP to help guide decision-making).*

6. What are the opportunities to better involve and represent affected racial/ethnic groups in the CAP implementation process?

*(Think about how your process could better include residents most impacted by the racial disparities described in Question 2).*

### Implementation

7. How does the CAP change or influence implementation?

*(Describe how CAP might change the way partners affected by the CAP do their work or think about their work).*

8. How might existing racial/ethnic disparities be affected? How might environmental justice communities/locations be affected?

*(Think about how the CAP will have an impact on racial disparities/ej communities described in the data section. Could it reduce disparities and improve environmental outcomes? Could it worsen disparities or environmental outcomes?)*

9. What obstacles exist in achieving the most equitable racial equity and environmental outcomes for the CAP?

*(Consider internal and external barriers that may hinder the work or prevent the desired outcomes. Outline any tactics the CAP does or should use to avoid, overcome, or change them. This could include identifying where authority rests for these roadblocks and naming partners to collaborate with to mitigate barriers).*

### Accountability

10. How does the CAP address unintended outcomes for affected racial/ethnic groups and environmental justice communities or locations?

*(Explain how the CAP monitors impacts on racial disparities and environmental outcomes and how the CAP will shift priorities if a negative impact becomes apparent. Think about the data or resources needed to monitor impact.)*

11. How does the CAP report the impacts of decisions affecting racial/ethnic groups and environmental justice communities and locations?



*(Describe how/if the CAP will continue to monitor the impacts of the CAP and how to report the outcomes. Think about who or what metrics should be involved in the reporting process).*

### **Phase 3: Apply Findings from Phases 1 and 2 to the CAP**

Integrate the findings from Phases 1 and 2. Pull together common themes, identify gaps, and revise CAP to incorporate adjustments from the EJ Scorecard and Qualitative Assessment.

Revise the CAP to include edits.

[Further detail to come]

### **Phase 4: CAP to Council Members for Approval**

[Further detail to come]

## **Component 2 – Assess implementation of CAP actions**

[Further detail to come]

### *EJ Screening Process*

The EJ Screening will be uniformly applied across any identified CAP implementation strategies/actions

1. Application of place-based or geographic EJ screening for certain CAP implementation actions
  - a. Identify existing EJ screening tool to use for implementation of CAP actions; alternatively, create an EJ screening tool that considers specific issues that relate to our region
  - b. Apply EJ screening to certain actions identified within the CAP (vetted through divisions)
    - i. If a project/initiative is located or can affect an EJ-specified location, then this triggers a process of assessment
    - ii. For regional research/technical assistance projects, an assessment should be required in all cases

### *Assessment of benefits and impacts*

The assessment of benefits and impacts process can be determined by implementing division(s), but such a process should be reviewed by the EJ task force to ensure a degree of consistency across climate work

2. Assessment of equitable allocation of benefits, while reducing harm, following EJ screening process. This can include the following or variations of the following -
  - a. Does the project or initiative benefit a certain location or racial/ethnic/socioeconomic group(s) more than others? If so, describe these benefits and how it affects this group(s) or location
  - b. Does the project or initiative cause harm to a location or racial/ethnic/socioeconomic group(s) more than others? If so, describe this harm and how it affects this group(s) or location
  - c. How does the project or initiative consider cumulative impacts or benefits to racial/ethnic/socioeconomic group(s) or a location? Describe the cumulative impacts and how it affects this group(s) or location

- d. What measures does the project or initiative take to allocate benefits, enhance environmental outcomes, and reduce harm for environmental justice communities or locations

### *Communication and Engagement*

The communication and engagement can be determined by implementing division(s), but such a process should be reviewed by the EJ task force to ensure a degree of consistency across climate work

3. Communications and engagement plans associated with CAP actions informed by EJ screening process and allocation of benefits assessment

### **Component 3 – Evaluation of EJ implementation**

[Detail to come]

### **Component 4 – EJ Guidance**

[Detail to come]

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