



July 26, 2022

Dear Representative Lambert and Congresswoman Blunt Rochester,

On behalf of the Southbridge Civic Association (SBCA), the Southbridge Community Development Corporation (SBCDC), and the South Wilmington Planning Network ([SWPN](#)), we thank you for your continued service to Delaware and its many communities, including Southbridge.

Within the context of the [Justice40](#) initiative, we write to advocate for Southbridge to be designated as a disadvantaged community. As the long-standing African American, working-class community in South Wilmington, Southbridge deserves special attention. Considering the lived experiences of residents that deal with the perils of flooding and the numerous brownfields in the area, as well as data that confirm social disadvantages in income, education, and health, we believe that formally recognizing Southbridge as a disadvantaged community is a crucial step on the path to climate, environmental, and social/economic equity.

As an important criterion to ensure representation in the context of the Justice40 initiative from the White House, which will “deliver at least 40 percent of the overall benefits from Federal investments in climate and clean energy to disadvantaged communities,”¹ our letter details the reasons we believe this designation will aid the community in its efforts for environmental cleanup and climate resilience. Furthermore, as recommended by the 2021 Southbridge Neighborhood Action Plan ([SNAP](#)), our letter will also illustrate how it is necessary to adjust the Census block group boundaries in South Wilmington to eliminate distortion in Southbridge’s Census statistics created by Christina Landing that will be further intensified by the development of [Riverfront East](#).

Today, however, even when pairing Southbridge with Christina Landing as Census Tract 19.02 (South Wilmington) currently does, the tract meets the [criteria](#) for a disadvantaged community using the [Climate and Economic Justice Screening Tool](#). This screening tool provides valuable insight into the key issues that the Justice40 initiative is meant to address in disadvantaged communities, including “climate change, clean energy and energy efficiency, clean transit, affordable and sustainable housing, training and workforce development, the remediation and reduction of legacy pollution, and the development of critical clean water infrastructure.”² In the area, legacy pollution (i.e.,

¹ <https://www.whitehouse.gov/omb/briefing-room/2021/07/20/the-path-to-achieving-justice40/>

² <https://screeningtool.geoplatform.gov/en/about>

proximity to hazardous waste facilities and proximity to a superfund) and poor health (i.e., asthma) are above the stated percentile thresholds that indicate disproportionate burdens. Combined with low income and higher education non-enrollment surpassing social burden thresholds, the area meets the criteria for a disadvantaged community, as defined by the screening tool.³

However, South Wilmington is no longer the more socially homogeneous area it once was when the original Census Tract and Block Group boundaries were drawn. If one were to walk around Christina Landing and the Riverfront, and then walk around Southbridge, these are two very different areas that share the same Census Tract (19.02). Both have an array of social and cultural dynamics that make people proud to call them home, and they now share a physical connector in the [South Wilmington Wetlands Park](#),⁴ but it is clear to us that Southbridge has disproportionately high levels of disadvantage and a clearer need for support from Justice40 than do its neighbors to the west. Comparatively, according to data cited in the SNAP, housing prices in Southbridge are lower by hundreds of thousands of dollars relative to Christina Landing and the Riverfront. In effect, these legacy boundaries were fine in representing the area before significant development occurred. Christina Landing already houses hundreds of new, middle- to upper-middle class residents, a figure that will soar into the thousands with the development of Riverfront East. If the full build-out of Riverfront East occurs without corresponding adjustments to Census boundaries, it may result in the further weakening of poverty signals from Southbridge and the loss of its disadvantaged status in the future.

Even today, because of these community differences within the same Census Tract, and because, at the block group level, Southbridge is “split in two” with a boundary going through the western part of the core residential area, neither is a genuine representation of the social, economic, and environmental conditions of *Southbridge*. Nor are they representative of conditions in Christina Landing or Riverfront East. Unfortunately, however, these distorted data were recently used to support the use of federal, equity-related transportation dollars in the development of Riverfront East (via a RAISE grant). Whatever its merits, that development, in our view, has little to do with enhancing equity for Southbridge residents. Undoubtedly, Christina Landing, ongoing condominium development along A St., the Riverfront, and Riverfront East will continue to radically shape the demographic characteristics of South Wilmington as they attract new residents from outside of the area. Equity funds, therefore, need to be spent in a

³ These data are accurate as of the last update to the website on 05/04/2022.

⁴ Also called the Southbridge Wetlands Park by some residents in Southbridge.

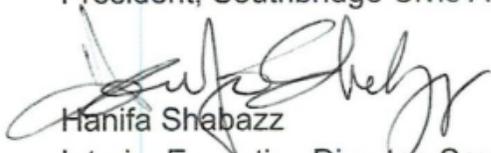
way that supports equity and these current initiatives don't do that. Thus, changes in how the community of Southbridge can be recognized and its specific needs addressed are warranted.

By formally recognizing Southbridge as a disadvantaged community in the context of Justice40, while also supporting efforts to re-draw the boundaries of South Wilmington to separate the community of Southbridge from Christina Landing and Riverfront East, the community and its partners can focus on channeling funding to promote equity in the areas that need it most. Without this, it stands to reason that the Riverfront East expansion could obscure the needs of Southbridge as social and economic changes flow across the area. Our plan is to utilize, among other tools, the [Justice40 Accelerator](#) in efforts to identify and apply for funds for these much-needed changes. As there are potentially other cases where equity funding is being pushed to projects that do not support equity due to the coarseness of Census tract boundaries, we recommend exploring more granular boundary delineations of disadvantaged areas or a review of equity related projects within disadvantaged Census tracts to see if they are, genuinely, equity related and should count towards the 40%. Delaware could add a step to review the projects that are funded to confirm they are beneficial towards supporting equity. As chair of the Justice40 oversight committee in Delaware, Representative Lambert, we think that you are well-positioned to argue for these things and, paired with Congresswoman Blunt Rochester, take the necessary steps to define new Census boundaries in South Wilmington to best support the community of Southbridge.

Sincerely,



Robert Cannon
President, Southbridge Civic Association



Hanifa Shabazz
Interim Executive Director, Southbridge Community Development Corporation



Britt Salen
Co-chair, South Wilmington Planning Network

[1] <https://www.whitehouse.gov/omb/briefing-room/2021/07/20/the-path-to-achieving-justice40/>

[2] <https://screeningtool.geoplatform.gov/en/about>

[3] These data are accurate as of the last update to the website on 05/04/2022.

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