

TCRPC Environmental Justice Analysis

The TCRPC serves as the primary forum where MDOT, local transit agencies, local jurisdictions, and the general public develop our area's transportation plans and programs. In this capacity, TCRPC recognizes the diversity of Clinton, Eaton and Ingham County citizens and communities and their transportation needs and works diligently to ensure that all people have access to the transportation planning process, especially those that have traditionally been under-represented. TCRPC adheres to publicly approved guidelines of the Public Participation Plan through which all citizens, regardless of race, color, gender, age, physical ability, or national origin are guaranteed full opportunity to participate in programs, plans and processes, including the development of the Regional Metropolitan Transportation Plan (MTP).

What is Environmental Justice (EJ)?

In 1964, the Civil Rights Act under Title VI was enacted and stated that "No Person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The Civil Rights Restoration Act of 1987 broadened the scope of Title VI, clarified the intent, and expanded the definition of the terms "programs and activities" to include all programs and activities of Federal-aid recipients, sub-recipients and contractors, whether such programs are Federally assisted or not.

In 1994, an Executive Order (Number 12898) directed every Federal agency, including the U.S. Department of Transportation (U.S. DOT), to identify and address the effects of all programs, policies, and activities on "minority populations and/or low-income populations." This Order was consistent with Title VI in considering fundamental environmental justice principles affecting low income and minority populations. The three fundamental environmental justice principles are:

To avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects on minority populations and low-income populations.

To ensure the full and fair participation by all potentially affected communities. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

In 1997, the U.S. DOT issued an Order that summarized and expanded on environmental justice requirements. The U.S. DOT Order applies to all transportation planning policy decisions and activities undertaken, funded, or approved by the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and Metropolitan Planning Organizations (MPO) among other U.S. DOT components. Also, the U.S. DOT Order specifically identifies five population groups in its emphasis on environmental justice requirements.

Environmental Justice and Transportation Planning in the Tri-County Region

TCRPC routinely conducts an environmental justice analysis for the proposed projects in the Regional Metropolitan Transportation Plan (MTP) and subsequent Transportation Improvement Programs (TIP). . The analysis undertaken by TCRPC supports principles and requirements of Title VI of the Civil Rights Act of 1964, the Executive Order 12898 (E.O.), and the 1997 U.S. Department of Transportation's Order to address environmental justice. To address the three environmental justice principles, the following summary approach was taken by TCRPC staff per guidelines developed by the U.S. DOT, FHWA, and FTA:

Step 1: Delineation and mapping of Minority Areas

Step 2: Delineation and mapping of Low Income Areas

Step 3: Analysis of Impacts on Minority Areas

Step 4: Analysis of Impacts on Low Income Areas

TCRPC Environmental Justice Analysis Methodology

Census (2010) data and American Community Survey (ACS) 5-Year estimates (2007-2011) are analyzed utilizing Geographic Information Systems software to determine the makeup and concentration of minority groups at the Census Block Group level for race and at the Census Tract level for low-income. Environmental Justice Areas are designated based on the population of the targeted population group as it compares to the overall population of the entire metropolitan area. In the case of race minorities, if any census block group exceeded the average population percentage for that minority group throughout the region as a whole, that block is flagged. For low-income identification, the same methodology is used as for the population groups, but census tracts geographies from the ACS data were used to determine the above average percentage areas. The indicator used for income from ACS estimates was poverty status. In the ACS estimates, the population for whom poverty status is determined is broken up into four age groups. The age group that most applies for our EJ income analysis, is that of those aged from 18 to 64 years since that is most generally, the working class. The tabular data within the data sets are presented as percentages of individuals per census tract that are at, or below, the poverty level. From this, averages at or above were flagged as EJ Areas for low-income. Together these defined areas were aggregated together to create a comprehensive geographic coverage constituting the "Environmental Justice" areas within the MPO.

Analysis of Impacts

With the minority and low-income areas delineated (EJ areas), an analysis of impacts could be completed. The analysis of potential impacts centers on three criteria:

- 1) Disproportionately high and adverse human health and environmental impacts to minority areas
- 2) Minimizing/blocking access of minority areas to the transportation system
- 3) Neglect of the transportation system in minority areas

Using the delineated Environmental Justice Areas, TCRPC is able to geographically overlay proposed MTP and TIP projects on the EJ areas to determine what projects

could have potential impacts based on our three defined criteria. The project is considered and flagged if it geographically intersected the EJ Areas.

Regional vs localized Impacts

After the location of the EJ areas and proposed projects have been identified an analysis is completed that looks at the overall percentage of projects within EJ areas. Also, an analysis is completed on each project that falls within an EJ area to ensure compliance three criteria listed above. Results from this analysis appear in every MTP and TIP document that is produced by the TCRPC.