

Improving the South Carolina Department of Transportation's Process for Environmental Justice Screening



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ACRONYM LIST

AASHTO	American Association of State Highway and Transportation Officials
ACS	American Community Survey
CE	Categorical Exclusion
CEJST	Climate and Economic Justice Screening Tool
CIA	Community Impact Assessment
EA	Environmental Assessment
EIS	Environmental Impact Statement
EJ	Environmental Justice
EJScreen	Environmental Justice Screening Tool
FHWA	Federal Highway Administration
GIS	Geographic Information System
NEPA	National Environmental Policy Act
PST	Project Screening Tool
SCDOT	South Carolina Department of Transportation
SDOT	State Departments of Transportation
STEAP	Screening Tool for Equity Analysis of Projects

1.0 Introduction

The impacts of past transportation decisions on minority and low-income populations are observable across most any interstate constructed within an urban environment of our country. Within South Carolina, the construction of Interstate 26 bisected a number of minority and low-income neighborhoods in North Charleston during the 1960s. Some of these same neighborhoods were yet again impacted by the construction of Interstate 526 in the 1980s resulting in additional residential displacements and further degradation of community composition and cohesion (Figure 1).

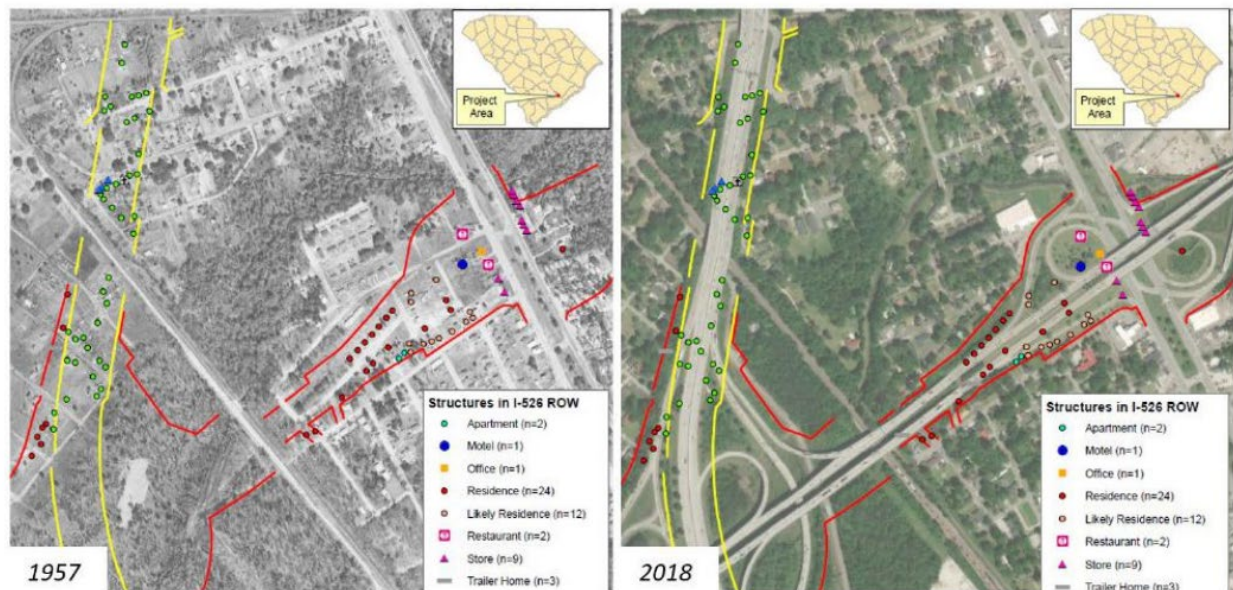


Figure 1. Aerial View of Neighborhoods Impacted by Construction of Interstates 26 and 526.

Specific protections for minority and low-income populations from federal projects weren't put into place until 1994 with the signing of the Environmental Justice Executive Order by President

Clinton¹. This order required federal agencies, such as the Federal Highway Administration (FHWA), to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. As a recipient of federal funds from FHWA, the South Carolina Department of Transportation (SCDOT) is required to comply with FHWA's guidance to address Environmental Justice during the National Environmental Policy Act (NEPA) review and approval process².

NEPA requires federal agencies and/or project sponsors like SCDOT to consider the impacts of their projects on the human and natural environment and to involve the public in the decision making process. To satisfy these requirements, SCDOT holds public meetings and conducts a number of studies (e.g. cultural resource surveys, wetland delineations) to evaluate and document the environmental impacts of a proposed transportation project. Depending on the scope of the transportation project, the environmental review and approval process can take as little as 3 months or as long as 5+ years.

One of SCDOT's strategic goals is to improve program delivery and increase the efficiency and reliability of the state's road network. Identifying potential environmental impacts early in the development of a transportation project helps SCDOT's environmental and engineering staff develop strategies for impact avoidance, community engagement, and community mitigation. Failure to identify these impacts early in the transportation development process can lead to schedule delays and increased costs.

¹ <https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice>

² https://www.environment.fhwa.dot.gov/env_topics/ej/guidance_ejustice-nepa.aspx

1.1 Problem Statement

SCDOT does not have a standardized process for screening impacts to Environmental Justice communities. The Environmental Office utilizes a screening tool to identify potential environmental impacts as soon as a transportation project is funded for development. The screening tool is a Geographic Information System (GIS) application called the Project Screening Tool (PST). The PST application includes over thirty different environmental layers (e.g. wetlands, streams, threatened and endangered species data, cultural resource data, etc.) that are used to identify potential impacts associated with a project. The tool allows SCDOT's environmental staff to quickly identify known environmental resources that could be impacted by a proposed project. The tool does not contain any information on demographic data that is available through the American Community Survey (ACS) Census data despite FHWA's guidance for identifying minority and low-income populations. The absence of demographic data within PST results in a process where impacts to EJ communities are not identified or considered until later in the development of a proposed transportation project.

SCDOT's current process for screening impacts to EJ communities occurs through Community Impact Assessments (CIA) which are only initiated during the preparation of two types of NEPA documents: Environmental Assessments (EA) and Environmental Impact Statements (EIS). The majority of environmental documents that SCDOT prepares are known as Categorical Exclusions (CE). According to FHWA's NEPA regulations³, CEs are defined as actions, based on FHWA's past experience with similar actions that do not involve significant environmental impacts. These actions include but are not limited to bridge replacements, intersection

³ <https://www.ecfr.gov/current/title-23/chapter-I/subchapter-H/part-771>

improvements, and safety improvements. Road widening projects can also be processed as CEs with FHWA approval if it is demonstrated that the project would not involve significant environmental impacts. Categorical Exclusions are often prepared by SCDOT's environmental staff without consideration of a project's impact on EJ communities.

Developing a standardized process for EJ analysis would give SCDOT the ability to 1) identify potential impacts to EJ populations early in the transportation development process 2) develop alternatives that avoid and/or reduce impacts to EJ populations 3) identify opportunities for EJ outreach and engagement and (4) reduce schedule delays.

1.3 Project Goals

The goal of this project is to identify a set of best management practices for screening and evaluating impacts to EJ communities. The project will also evaluate current web applications for developing demographic and community profiles that can be used to assess impacts to EJ communities and enhance community outreach. The overall project goal is to identify a process improvement that SCDOT's environmental office can implement to 1) screen for and analyze EJ impacts and 2) enhance the Department's public engagement strategies.

2.0 Data Collection

2.1 Review of State Departments of Transportation Environmental Manuals

The initial data collection for the project entailed a review of each State Department of Transportation's (SDOT) environmental manual to determine which agencies had an established protocol for screening and documenting impacts to EJ communities. This inventory also

included notes regarding specific applications that were used to screen impacts to EJ communities (Appendix A).

2.2 Environmental Justice Screening Survey

The second step in data collection included the development of an EJ Screening Survey that was sent to SDOTs who participate in the American Association of State Highway and Transportation Officials (AASHTO) Committee on Environment and Sustainability (Appendix B). The Committee on Environment and Sustainability's subcommittee on Environmental Process meets monthly to discuss a variety of environmental topics. The Environmental Process subcommittee provides SDOTs with a forum to conduct surveys and evaluate best management practices that have been adopted by other states.

The survey sent to the Environmental Process subcommittee included the following questions:

1. Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.
2. Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJ Screen, STEAO, Climate and Economic Justice Screening Tool (from Council on Environmental Quality), an In-house Agency Specific Tool, Other (please specify).
3. According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within a study area?
4. What percentile does your agency use as a threshold to identify minority block groups?
5. How does your agency identify low-income block groups?
6. If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

7. How does your agency document EJ-related analyses and findings on CE-level environmental documents?
8. What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?
9. How satisfied are you with your agency's EJ screening protocols?

2.3 Environmental Justice Screening Applications

The final step in the data collection process involved evaluating online tools to gather information on the presence on EJ communities (Appendix C). Three primary applications were reviewed:

The STEAP - Screening Tool for Equity Analysis of Projects is an extension of FHWA's HEPGIS web application that permits rapid screening of potential project locations anywhere in the United States to support Title VI, environment justice (EJ) & other socioeconomic data analyses. The tool provides estimates of the socioeconomic characteristics of the resident population surrounding a project location. The core data used to calculate the demographics is the latest American Community Survey 2015-2019 Five Year data. The tool will be updated to incorporate Census 2020 data when it becomes available⁴.

EJScreen is an EPA's environmental justice mapping and screening tool that provides EPA with a nationally consistent dataset and approach for combining environmental and demographic socioeconomic indicators. EJScreen users choose a geographic area; the tool then provides demographic socioeconomic and environmental information for that area. All of the EJScreen indicators are publicly-available data. EJScreen simply provides a way to display this

⁴ <https://hepgis.fhwa.dot.gov/FhwaGis/help/TitleVI-About.html>

information and includes a method for combining environmental and demographic indicators into EJ indexes⁵.

Climate and Economic Justice Screening Tool (CEJST) shows information about the burdens that community's experience. It uses datasets to identify indicators of burden⁶.

3.0 Data Analysis

3.1 Review of State DOTs Environmental Manuals

The review of SDOTs' Environmental Manuals determined that 19 of 50 states had established protocols for conducting EJ Screening and Analysis. Eight of the 50 SDOTs had limited information regarding how to conduct EJ Screening and Analysis while the remaining 23 SDOTs had no published information regarding the topic (refer to Appendix). A more thorough review of the following SDOTs was performed to identify best management practices related to EJ Screening and Analysis: California DOT, Colorado DOT, Hawaii DOT, Iowa DOT, Maryland DOT, Ohio DOT, Oregon DOT, Pennsylvania DOT, and Washington DOT. The following best management practices were identified for further consideration in the development of an EJ Screening and Analysis process for SCDOT:

Identification of EJ Populations

- Develop Demographic Profile of Affected Community
- Field Observations should be used to supplement initial data screening. Indicators of EJ populations in the vicinity of the project area include:
 - Grocery stores specializing in ethnic cuisine
 - Retail stores specializing in ethnic goods and services

⁵ <https://www.epa.gov/ejscreen/what-ejscreen>

⁶ <https://screeningtool.geoplatform.gov/en/about#5.16/34.243/-97.898>

- Places of worship serving ethnic groups or minorities
- Identifiable public and elderly housing facilities
- Local government agencies serving special minority or low-income needs
- Local non-governmental minority or low-income advocacy organizations
- Use of non-English language on local signs and advertising
- Local newspapers or newsletters or radio stations
- Public or subsidized housing

Types of Impacts

- Economic Impacts: economic vitality, employment, transportation development
- Social Impacts: aesthetic values, community cohesion, isolation, exclusion or separation of minority or low-income individuals from the broader community, availability of community facilities and services, changes in travel patterns and accessibility
- Environmental Impacts: air, noise, and water pollution, vibration, soil contamination, hazardous materials, traffic congestion
- Human health/displacements: number of households/businesses, family/business characteristics, available housing, housing affordability

Potential Mitigation Measures

- Minimizing impacts by limiting the degree or magnitude of the project's impacts on the population
- Reducing or eliminating the impact over time by preservation and maintenance of the operations over time
- Compensating for the impact by replacing or providing substitute resources or environments
- Increased access to facilities/services (e.g. adding a bus stop, providing a sidewalk where one didn't previously exist)
- Agreed upon enhancements to affected communities
- Restoration of connectivity that was previously lost by a transportation project
- Replacement housing or enhanced relocation assistance
- Aesthetic and visual improvements
- Traffic signalization and street lighting improvements
- Employment, training, and contracting opportunities

- Noise barriers and buffer zones
- Enhanced community interaction and education during the construction phase to reduce adverse effects of access restrictions and detours
- Visual screening

Public Outreach

- Take care to ensure that the public involvement program reaches all target audiences. Public outreach activities should reach people where they live and in ways that have meaning to them.
- Determine how local residents receive information and use that medium to reach out to the community.
- Stakeholder engagement including local officials and civic leaders, social service providers, churches and religious organizations, community centers, senior centers, assisted living communities, transit services
- Provide interpreters at meetings

3.2 Environmental Justice Screening Survey Results

A total number of 15 SDOTs responded to the EJ Screening Survey (refer to Appendix). Eleven SDOTs stated that they currently had a standardized process for screening impacts to minority and low-income populations. The vast majority of SDOTs utilize a combination of Census Data available from the American Community Survey (ACS) and EJ Screen for identifying minority and low-income populations. Some SDOTs utilize percentile thresholds ranging from 15% to 70% for the early identification of minority or low-income populations. A number of SDOTs also commented that they supplement their screening of Census Data with field reviews and interviews with local staff about a project study area.

The evaluation and documentation of EJ impacts varies greatly across the SDOTs that responded to the survey. Oklahoma DOT utilizes a standard Community Impact Assessment Form to evaluate and document EJ impacts while other SDOTs, like Virginia DOT and Illinois DOT,

emphasized a defined process for EJ impact evaluation. Virginia DOT’s process for EJ impact evaluation exemplifies the basic framework that was consistent across most of the SDOTs:

- 1) Assess the demographics of the population relative to a project area using EJ Screen
- 2) Determine how the project interacts with that population. Project documentation shall include an assessment of whether the project involves major traffic disruptions, more than minor amounts of temporary or permanent right-of-way acquisition or more than limited amounts of displacement, community disruptions, and disruption of emergency services.
- 3) If a project involves any of the conditions listed above, assess and document whether the impact is borne predominantly by areas that meet the definition for an EJ community.
- 4) If a project is found to have disproportionately high and adverse effects to areas that meet the definition for an EJ community, appropriately document the finding and any necessary mitigation measures.

The techniques used by SDOTs to engage EJ populations were relatively consistent with the majority of respondents emphasizing the need for community meetings, stakeholder meetings, pop-up events, surveys, mailers, and community advisory groups. Pennsylvania DOT pointed to the need to establish ongoing relationships with the EJ community and to utilize a “diverse array of techniques for conveying public information to reflect the variety of ways people access information” including the following techniques:

- | | |
|------------------------|---------------------------------|
| -advertisements | -magnets |
| -badges and buttons | -newsletters |
| -billboards | -newspaper inserts and articles |
| -brochures | -notices |
| -church bulletins | -posters |
| -community newsletters | -press releases |
| -display boards | -radio announcements |
| -ethnic specific media | -school handouts |
| -fact sheets | -utility bill stuffers |

-fast food placemats

-websites

-fliers

social media

-grocery bags

-transit vehicle placards

-placards

3.3 Environmental Justice Screening Survey Applications

The review of EJ Screening Survey Applications determined that EJ Screen provided the necessary data from ACS Census Data for the early identification of minority and low-income populations within a proposed study area. The tool allows the users to define a study and quickly determine whether a Census Block Group had a high or low percentile of minority or low-income population. EJ Screen was also the most common application referenced by SDOTs in the EJ Screening Survey. A side by side comparison of the functionality that each tool provides is illustrated in Appendix B. Each of the applications provides a wide variety of demographic data that should be considered when assessing impacts to EJ populations. EJ Screen is best suited for identifying potential EJ populations within a project study area while STEAP and CEJST can be used to identify environmental stressors (e.g. sustainable housing, health burdens, legacy pollution, clean water, etc.) affecting certain EJ populations.

4.0 Implementation Plan

The results of data collection have identified a set of best management practices that can be implemented within six months to one year. The following action steps and responsible party were identified as part of the action plan:

- 1) Obtain ACS Census Data in GIS format for integration into SCDOT's PST application. SCDOT's Director of Environmental will request access to the data from the Statewide

GIS Coordinator. The data will be incorporated into PST by the administrator of the application. Cost: \$0. Timeframe: 3 months.

- 2) Develop an internal process flowchart that identifies key steps in identifying EJ communities and steps for evaluating impacts. The process flowchart will be developed by SCDOT's Director of Environmental Services and NEPA Division Manager. Cost: \$0. Timeframe: 6 months.
- 3) Identify categories of projects that are exempt from EJ analysis. The categories will be identified by SCDOT's Director of Environmental Services, SCDOT's NEPA Division Manager, and FHWA's Lead Environmental Specialist. Cost: \$0. Timeframe: 6 months.
- 4) Develop EJ Screening and Analysis Form to document identification and evaluation of EJ impacts. The form will be included with all environmental documents requiring EJ analysis. Responsible parties: SCDOT's Director of Environmental Services, SCDOT's NEPA Division Manager, and FHWA's Lead Environmental Specialist. Cost: \$0. Timeframe: 6 months.

Information developed during the implementation phase will be shared with all SCDOT Environmental staff upon completion. All EJ related information will be posted to SCDOT's Environmental website and shared with environmental consultants through a consultant workshop, Lunch and Learns, and newsletters. The information will be incorporated into SCDOT's standard operating procedure upon completion of items 1-4 listed above.

5.0 Evaluation Method

SCDOT's Director of Environmental and NEPA Division Manager will be responsible for monitoring the success of the new workflow process and documentation requirements. Within one year of the implementation phase, SCDOT's Environmental Office will meet with FHWA's environmental staff to evaluate the workflow process, methods for EJ population identification, documentation requirements, and results of new methodology. Information on the number of EJ Analysis Forms will be tracked to monitor how often the analysis is occurring. Finally, SCDOT's Public Involvement Director will be tasked with tracking how often EJ public

outreach activities have occurred during the previous year and which methods were performed to engage EJ populations.

6.0 Summary and Recommendations

This project has identified a number of steps to improve SCDOT's process for EJ screening and analysis. The following recommendations have been identified for future action:

- 1) **Demographic Profiles:** Demographic profiles of project corridors should be developed at the onset of project development. The results of the demographic profiles should be used as the starting point for conducting EJ analysis and EJ outreach.
- 2) **Impact Evaluation:** SCDOT should develop a written process for EJ analysis that is consistent with FHWA's 2011 Guidance. The process for EJ analysis should consider the range of transportation-related impacts that could occur versus the existing process which is primarily focused on residential displacements.
- 3) **Online EJ Applications:** SCDOT should utilize data from EJ Screen, STEAP, and CEJST applications when evaluating impacts to identified EJ populations. These applications provide a wealth of data regarding environmental stressors affecting these communities.
- 4) **Training:** SCDOT's Environmental Office needs to provide training to SCDOT Program Managers and Environmental Consultants on any new methods or requirements for EJ analysis.

APPENDIX A

REVIEW OF STATE DEPARTMENT OF TRANSPORTATION MANUALS

State	Protocol?	Additional Info	Presentable Findings	Rating Out of 10
Alabama	No		Barely had any EJ info. Only mentioned in passing on a Public	2
Alaska	Yes	EPA Screening Tool. Website links to EPA, FHWA, and EJ Executive Order. Nothing produced specifically by Alaska DOT.	Uses EJScreen (EPA Screening Tool). Only contains links to EPA and FHWA websites. Nothing created specifically for their department.	4
Arizona	Yes	Minimalist flowchart determining when to reach EJ status. https://azdot.gov/business/environmental-planning/guidance-federal-aid-projects/title-vi-and-environmental-justice	Provides a flowchart determining when to use EJ protocols. Links to FHWA and E.O.	4
Arkansas	No	Only says that they "do assessments."	A small paragraph citing E.O. on EJ from 1994	2
California	Yes	https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-4-community-impacts-assessment	Gives a comprehensive overview of how to assess and implement EJ impacts	8
Colorado	Yes	Chapter 9.15 of document in folder (page 111)	Very thorough instruction on how to identify and analyze EJ impacts	9
Connecticut	Sort Of	Connecticut Equity and Environmental Justice Advisory Council (CEEJAC). https://portal.ct.gov/DEEP/Environmental-Justice/Connecticut-Equity-and-Environmental-Justice-Advisory-Council	Not a lot of specific information, but has an Equity and Environmental Justice Advisory Council	6
Delaware	No		Almost no information	1
Florida	No		Outdated guidance from 1997	2
Georgia	No		Findings from an outreach report in 2015. Nothing updated. Mostly	5
Hawaii	Yes	A numbered list of Title VI Program Responsibilities (page 49 of document in folder), Techniques for Involving Environmental Justice Population in Planning and Project Development (page 67), & Compliance with EJ (68)	Excellent information available and techniques provided for EJ work	8
Idaho	No	There is a document in the folder, but it's less than helpful	An outdated plan from 2017	4
Illinois	No		Has a Commission on Environmental Justice but not much else	3
Indiana	Yes	Page 5 of downloaded document	Great outline of methodology for handling EJ cases	7
Iowa	Yes	Page 386 of downloaded document	Thorough methodology of EJ analyses	8
Kansas	No		Almost no information. Extremely brief overview	1
Kentucky	Sort Of	Page 21 of downloaded document, which comes from 2017 but still has useful information	Initiatives from 2017 outlined, but not in great detail	3
Louisiana	No	Page 38 of downloaded document. Contains no specific plan or screening tools.	No specific data or screening tools	2
Maine	No		Says they will comply with EJ regulations, but doesn't say how	2
Maryland	Yes	Many helpful links related to environmental justice. https://mde.maryland.gov/programs/crossmedia/EnvironmentalJustice/Pages/webtools.aspx . The Commission on Environmental Justice and Sustainable Communities (CEJSC)	Excellent information provided	8
Massachusetts	Yes	Has an interactive EJ map. https://mass-eoea.maps.arcgis.com/apps/webappviewer/index.html?id=1d6f63e7762a48e5930de84ed4849212 . Downloaded document in folder	Has an interactive EJ map	6
Michigan	Yes		Has thorough procedures in place	7
Minnesota	No		Almost no information available. Links to FHWA website	2
Mississippi	No		Cites old E.O. but doesn't give any implementation or screening information	1
Missouri	Sort Of	Not so much a screening tool as is a list of objectives	Not a lot of screening, just a list of objectives	4
Montana	Sort Of	Outdated environmental justice manual	Outdated EJ manual	4
Nebraska	Yes		Outlines EJ process well	7
Nevada	No	Just links to FHWA website	Briefly and vaguely answers questions	2
New Hampshire	No		Says they will comply with EJ regulations, but doesn't say how	2
New Jersey	No	Some outdated information available, but none of any value	Gives generic information	2
New Mexico	No	https://www.env.nm.gov/solid-waste/environmental-justice/	Nothing from DOT. A brief overview from New Mexico Environment Department	3
New York	Sort Of	Interactive "Disadvantaged Communities Map" not specifically from NYDOT. https://climate.ny.gov/Our-Climates-Act/Disadvantaged-Communities-Criteria/Disadvantaged-Communities-Map	Interactive "Disadvantaged Communities Map" not specifically from NYDOT. https://climate.ny.gov/Our-Climates-Act/Disadvantaged-Communities-Criteria/Disadvantaged-Communities-Map	4
North Carolina	Yes	Community Mapping System given by NCDEQ. Secretary's Environmental Justice and Equity Board https://deq.nc.gov/outreach-education/environmental-justice/secretarys-environmental-justice-and-equity-board#subcommittee-materials .	Community Mapping System and Secretary's Environmental Justice and Equity Board	7
North Dakota	No		Generic Information Provided	2
Ohio	Yes	Requires the use of ODOT's Transportation Information Mapping System to identify if Underserved Populations are present in a proposed area. https://www.transportation.ohio.gov/programs/environmental-services/manuals-guidance-landing/underserved-populations-guidance	Requires the use of ODOT's Transportation Mapping System to identify if Underserved Populations are present	8
Oklahoma	No		Outdated and basic information	3
Oregon	Yes	Possibly the most thorough example	Possibly the most thorough	9
Pennsylvania	Yes	Comprehensive document	Very comprehensive	8
Rhode Island	Sort Of	Could only find a "Long Range Transportation Plan- 2040 Environmental Justice Analysis" from September 2020 and an older implementation plan	Could only find a "Long Range Transportation Plan- 2040 Environmental Justice Analysis" from September 2020 and an older implementation plan	5
South Carolina	No	EJScreen listed on website	Broad information	3
South Dakota	No		Outdated guidelines from 1994	3

Tennessee	No	https://www.tn.gov/tdot/civil-rights/title-vi-program/environmental-justice.html .	Almost no information provided	2
Texas	Yes		Outdated but thorough environmental handbook that contains SOME useful information	4
Utah	No		Little to no information given	2
Vermont	Yes		Answers a lot of questions but not necessarily helpful for screening purposes	6
Virginia	Sort Of	Block level demographic maps. https://www.virginiadot.org/business/civil_rights_environmental_justice.asp	Block level demographic maps only	4
Washington	Yes	Uses EJScreen, Office of the Superintendent of Public Instruction, and a "Determining Health Disparities" PDF. Useful links at this website: https://wsdot.wa.gov/engineering-standards/environmental-guidance/environmental-justice-title-vi AND https://www.youtube.com/watch?v=jOUd7_1b1Mw	Near perfect	9
West Virginia	No		No information provided	1
Wisconsin	Sort Of	Factor sheet.	Provides a factor sheet	3
Wyoming	Yes	Originally from 2014. Page 32 of downloaded document	Originally from 2014, but still relatively helpful	6

APPENDIX B

ENIRONMENTAL JUSTICE SCREENING SURVEY



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

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DOT Name Michigan DOT

Job Title Transportation Planner, EJ

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Yes. For project-level C/E jobs, MDOT Transportation Planning and Environmental overlays a layer of MDOT EJ Layers Census tract data with Project study area points and lines. Those projects whose study areas are in EJ Census tracts are to be identified and the 5-year-plan process and stakeholder/public involvement and project commitments by MDOT and the regional MPO is to be documented and tracked through the project development to construction process.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

We currently use ArcGIS to overlay project points/lines with Census demographic data.

We are developing an in-house MDOT EJ dashboard using Census data for demographics and project study area points and lines.

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Census data - comparing it to state or local jurisdiction percentiles at Census tract level.
 How MDOT Planning EJ Zones Are Identified: Environmental Justice Methodology
 As part of the State of Michigan 2045 Long-Range Transportation Plan (SLRTP), Michigan Mobility 2045, development process, a work group of state, local and Federal stakeholders was established to review the previous EJ methodology used and to look at best practices in Michigan and other states to identify potential improvements to the EJ review process. After reviewing many potential methodologies, the group recommended using a variation of the process used by the Washtenaw Area Transportation Study (WATS) from the Ann Arbor, Michigan, Metropolitan Planning Organization (MPO) area, but tailored to fit Michigan as a whole. This methodology differs from previous methodology by taking the LQ of each EJ group, adding them together and then taking that summed LQ amount and stratifying the data by percentile. The areas that are within 50th percentile or higher are then considered in an EJ zone for analysis in planning documents. This reduces the number of EJ zones to allow for a more focused attention on EJ communities in the comparison of projects within EJ zones.

The group also recommended using the MDOT Guidelines for Stakeholder Engagement to review projects that may impact EJ communities. Projects that consist of reconstruction, bridge replacement, capacity improvements adding a lane more than 0.5 miles, and new roads are of potential interest to EJ communities. In these instances where this type of project intersects an EJ zone, we recommend MDOT region staff use the MDOT Guidelines for Stakeholder Engagement to discuss with the community additional needs related to the project, particularly focusing on nonmotorized and transit-related needs as appropriate to the context of the community, at the appropriate time in the design process to meaningfully engage the public in discussion of their needs. Another benefit of this revised analysis is that it is in alignment with projects that require additional public involvement through the State Transportation Improvement Program (STIP) process. A link to the guidelines is online at Guidelines for Stakeholder Engagement.

Region staff should focus on engaging EJ communities early in the transportation planning process. For Projects with special concern to EJ populations in the area, measures should be taken to make sure they are included within the community engagement process. Review of local MPO plans related to projects in this list is also recommended.

What percentile does your agency use as a threshold to identify minority block groups?

currently, 70th percentile and higher compared to the state

How does your agency identify low-income block groups?

How MDOT Planning EJ Zones Are Identified: Environmental Justice Methodology

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Region staff should focus on engaging EJ communities early in the transportation planning process. For Projects with special concern to EJ populations in the area, measures should be taken to make sure they are included within the community engagement process. Review of local MPO plans related to projects in this list is also recommended.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

New staff in MDOT scoping, transportation planning, and environmental project-level EJ review are making connections to structure and align and document evaluation of impacts to low-income/minority communities earlier in the development process.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

1. To determine if a project is within an MDOT EJ zone area of interest, an ArcGIS desktop review overlays the project and a 500-foot selection buffer over the MDOT EJ Zone minority and low-income population maps or MDOT staff, local/regional agencies or contacts, or local/regional planning documents identify other readily identifiable minority and/or low-income populations. If there are no EJ Zones or readily identifiable EJ populations, A project study map with the MDOT EJ Zones and project lines and points is saved in Specialist project documentation. The review states:

- No impact. The project study area does not contain any MDOT EJ Zones, as verified in a desk survey using ArcGIS and US Census data. No minority or low-income populations have been identified that would be adversely impacted by the proposed project as determined above. Therefore, in accordance with the provisions of E.O. 12898 and FHWA Order 6640.23A, no further EJ analysis is required.

- If issues of concern to low income/minority populations are identified, additional review by the MDOT Environmental Services Section is required.

2. If the project study area contains EJ Zones or readily identifiable EJ populations, project analysis and documentation includes uploading a project study map and demographic information for identified EJ populations to the project's Environmental sub-folder in PW. An email with the map attached is sent to inform the project team of the EJ population demographics and that any concerns about potential impacts must be shared with the Environmental Specialist for additional review.

If no potential impacts are identified, the EJ review will require that any additional project stakeholder engagement/public involvement must include activities for meaningful EJ population participation:

- For guidance on required stakeholder engagement, see MDOT Guidelines for Stakeholder Engagement. In accordance with the MDOT Public Hearing/Public Meeting guidance document, in person public involvement shall be in the project area, familiar to the public, easy to reach (on a public transit route, if possible), in compliance with the requirements of the Americans with Disabilities Act (ADA), have sufficient parking, and be appropriate to the meeting purpose and format.

- If issues of concern to EJ populations are identified, additional review by the MDOT Environmental Services Section is required. Comments or issues of concern to EJ populations must be documented and, if possible, summarized by neighborhood or location.

- Non-motorized/sidewalk detours in or within 1000 feet of MDOT EJ Zone locations require additional review to determine any impacts in the relative safety in the EJ area for pedestrians, bicyclists, motorists or impacts on safe and easy access to community or regional resources (shopping, bus stops, schools, etc.).

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

Community meetings, stakeholder meetings, consultation with local jurisdictions, connecting with MPO EJ contacts and resources.

How satisfied are you with your agency's EJ screening protocols?

3 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Leslie Novotny
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DOT Name Oklahoma Department of Transportation
Job Title NEPA Program Manager

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Yes. A Community Impact Assessment form is used mostly to analyze impacts. Public involvement is dependent on project scope, but all projects that have proposed right-of-way will have letters sent to property owners and stakeholders requesting their input.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

EJScreen

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Census Data and data from EJScreen

What percentile does your agency use as a threshold to identify minority block groups?

Based from the definition in dot5610.2(a), we identify the EJ population as readily identifiable group. For the most part, these block groups usually are 50% or above. However, the state average has also been used. We will also look for signs for minority population, such as a community facility that serves a minority population or signage in another language.

How does your agency identify low-income block groups?

The same practice as above.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

ODOT will analyze impacts with a Community Impact Assessment. If the impacts are low, such as one residential relocation as a result of a symmetrical widening (adding shoulders) on existing alignment, Census Data maps and a short write-up in the CE is all that is completed.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

ODOT has a short write-up of the findings from the EJ analysis and public involvement, if performed, in the CE memo and attached full analysis in attachments.

If your agency uses a standardized form or document, please upload it below.



What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

ODOT uses different types of engagement processes dependent on the project needs. We have used community meeting, pop-up events, stakeholder meetings and surveys.

How satisfied are you with your agency's EJ screening protocols?

3 / 5



Environmental Justice Screening Survey

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Employee Name Sarah Tchang
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DOT Name WSDOT
Job Title NEPA/SEPA Specialist

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

1. For CE projects, review if the project is exempt from detailed analysis. We use a decision matrix and checklist.
2. Determine community demographics with the EPA EJ Screen (<https://ejscreen.epa.gov/mapper/>) and the Office of Superintendent of Publish Instruction (<https://washingtonstatereportcard.ospi.k12.wa.us/>).
3. Determine language service needs (<https://data.census.gov/cedsci/>).
4. Develop a public involvement strategy.
5. Write an EJ memo if needed.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

EJScreen, Office of Superintendent of Publish Instruction tool, Census data site

[See first question for links.]

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

We use the ACS data from the EPA EJScreen.

What percentile does your agency use as a threshold to identify minority block groups?

We use the Census data from the EPA EJScreen and Office of Superintendent of Publish Instruction data.

How does your agency identify low-income block groups?

We use the ACS data from the EPA EJScreen.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes,

please describe this practice.

Conduct community engagement when appropriate for the project following agency Community Engagement Plan. Evaluate impacts to the community including detour routes, traffic impacts, noise & air impacts & etc. If needed, evaluate mitigation measures to avoid or minimize any adverse impacts.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

Please see answer to question 1.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

I do not drive these events/meetings, so I do not know these details.

How satisfied are you with your agency's EJ screening protocols? 3 / 5



Environmental Justice Screening Survey

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Employee Name Nick Hines
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Job Title NEPA Supervisor

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

No

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

Typically only do EJ for EAs and EISs and have the consultant do the work. They use to use the census data. We average only 1 EA/EIS per 5 years. So 99% of what we do are CEs. We are trying to keep it to not needing an analysis for CE projects. If we do have to start doing reviews on CEs then likely will use EJScreen or STEAP.

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Typically a consultant handles this for us.

What percentile does your agency use as a threshold to identify minority block groups?

Do not have an agency specific threshold. Defer to federal guidelines.

How does your agency identify low-income block groups?

Do not have a specific method. Defer to federal guidelines.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

No

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

We just have a yes/no question that we answer in our CEs. "Would the project cause disproportionately high and adverse effects on minority and/or low income populations?"

Since we are mainly in pavement preservation the answer has been no.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

For larger projects we do meeting in the community, mailers and occasionally advisory groups.

How satisfied are you with your agency's EJ screening protocols? 3 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Carissa Watanabe
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DOT Name Utah DOT
Job Title ENV Program Mgr

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

No - generally we try to use ACS 5-yr data but need a more standardized process as well

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

University Demographics Site <https://gardner.utah.edu/demographics/> EJ Screen

Side note: our State Dept of Env Quality is looking to provide a state-wide screening tool

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Census data

What percentile does your agency use as a threshold to identify minority block groups?

No threshold set

How does your agency identify low-income block groups?

Census data

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

No

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

Working on a checklist to comply with new FHWA policy on relocations but otherwise documentation is not provided unless potential for EJ impacts.

What techniques does your agency use to engage EJ populations in the transportation decision

making process (e.g. community meetings, pop-up events, community advisory groups)?

community pop-ups, community advisory groups

How satisfied are you with your agency's EJ screening protocols?

2 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Ruth Roaza
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DOT Name Florida DOT
Job Title Environmental Process Analyst

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Yes. We use a combination of a desktop review, field review, and community outreach. We have an in-house GIS analysis report that provides demographic data to initially identify low-income and minority populations as well as other groups who may have been traditionally underserved.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

We use an in-house, Agency-specific tool that uses data from the US Census bureau. Some project teams also use EJScreen.

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

We use the US Census Bureau's American Community Survey (ACS) to identify population and households below poverty level as well as households with public assistance income.

What percentile does your agency use as a threshold to identify minority block groups?

greater than or equal to 50% or meaningfully greater than the minority population percent in the reference community (usually county). "Meaningfully Greater" is not defined in the regulations, but we generally train people to consider 10% points higher than the reference community as meaningful.

How does your agency identify low-income block groups?

We use ACS data.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

We have a standard procedure called a Sociocultural Effects Evaluation to evaluate impacts to communities, including EJ populations.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

Currently, not on our (c) and (d) listed CE; but we do on our documented CEs. We are currently adding EJ-related documentation to all types of CEs.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

We have a very robust public involvement program that includes all of the above types of outreach, which are used as appropriate for the specific project. We also use hybrid meetings if those will reach additional people.

How satisfied are you with your agency's EJ screening protocols?

4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Jo Dent

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DOT Name Missouri Department of Transportation

Job Title Sr. Environmental Specialist

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

The process we have is fluid and may be adjusted based on the type/ complexity of a project and proposed improvements, project location, amounts of new ROW/ easements needed, if there would be displacements, etc. Generally the process could include any or all of the following: Define the project study area and develop a community profile based on the study area boundaries (identify characteristics of the affected area - travel patterns, neighborhood boundaries, locations of residences/businesses, locations of parks and trails, demographic information, economic data, social history of communities, review existing and future land use plans, etc.); Consult with district engineers about known EJ/LEP populations in the project limits and study area; Use EJScreen as screening tool to determine areas that may require further analysis; Develop a map(s) to identify concentrations/distributions of these populations in relation to the project area and areas of direct impact; Employ public involvement/outreach methods based on the type of project and if EJ/LEP populations could be directly impacted; Directly notify known EJ/LEP populations about the project and any upcoming public meetings/hearings through mailers, fliers, newsletters, radio stations, newspapers, press releases, social media, websites, etc. For LEPs, use of newspapers and radio stations that speak languages specific to the LEPs in the area, if these sources are available. Also check with libraries who often offer free English learning classes and identify public signs in the project area that are in other languages; If EJ/LEP populations could be directly affected by construction impacts and/or the completed project, reach out to neighborhood/community groups/leaders, local officials, churches, and other sources important to these populations to obtain their input and assistance on how to minimize or avoid impacts; Provide a minimum 2-week public comment period to accept written comments via comment cards, mail, email, and social media posts. Consider public comments received to determine if further review of project impacts is necessary and if the project could be designed to avoid, minimize, or mitigate impacts to EJ/LEP populations. Continue public outreach to EJ/LEP populations throughout the life of the project; If economically and logistically feasible, implement enhancements in the project area such as ADA sidewalks, sheltered bus stops, trails/trail connections, bike lanes, etc.; Identify beneficial project impacts to EJ/LEP populations and communicate them to these populations; For new ROW/easements and displacements, the URA is adhered.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

Mainly EJScreen, Google Earth, ArcMap GIS, and Census Bureau LEP data. Currently learning about the use of CEJST. In addition to applications, we may review local comprehensive planning and study documents including those that have been developed by MPOs and RPCs that may include more recent and reliable demographic data specific to local areas.

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Other than screening tools such as EJScreen, we work with district staff who are usually more knowledgeable about local areas for assistance in identify low-income populations. We identify public/government subsidized housing locations, homeless populations, concentrations of discount stores, low-cost or free medical clinics, subsidized day care facilities, etc. Discussions with social service agencies, schools (school lunch program data), school bus drivers, transit providers, churches, hospitals and medical practitioners, retirement homes/assisted living facilities, non-profit and civic groups, local officials, law enforcement, MPOs/RPCs, etc.

What percentile does your agency use as a threshold to identify minority block groups?

Varies based on the type of project and impacts.

How does your agency identify low-income block groups?

EJScreen/US Census

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

Described above

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

Varies by project, some require more analyses and documentation than others. Use of the screening tools, public involvement/outreach, identifying direct impacts to EJ populations, etc. No standard form used. It is documented by public involvement materials, tables, descriptions, maps, listing of sources, documented field visits and interviews, etc.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

Public meetings; public hearings; press releases to newspapers, radio stations, project websites, social media posts; fliers and mailers; CAG/stakeholder meetings, etc.

How satisfied are you with your agency's EJ screening protocols? 4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name CAROL LEE ROALKVAM
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DOT Name WA State DOT
Job Title Policy Branch Manager

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Yes. Please see our website. If you want a briefing, let me know. All level of NEPA include some EJ.
<https://wsdot.wa.gov/engineering-standards/environmental-guidance/environmental-justice-title-vi>

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

EJScreen, WA State's Environmental Health Disparities Mapping Tool, School data, and more as described in our detailed procedures.

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

EJScreen and state tools (EHD Mapping Tool)

What percentile does your agency use as a threshold to identify minority block groups?

We don't use a threshold. We disclose the demographics for the project area. Whether or not an EJ memo is required is based on the impacts of the action.

How does your agency identify low-income block groups?

Using tools described above.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

Yes. Please see our website.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

We use a decision matrix. <https://wsdot.wa.gov/sites/default/files/2022-07/Env-EJ-DecisionMatrix-Nov2021.pdf>

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

It depends on the project action. We coordinate with our Office of Equity and Civil Rights and region/modal communications staff to develop an inclusive public involvement strategy tailored to the communities who may be touched by the project.

How satisfied are you with your agency's EJ screening protocols? 4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Susan White

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DOT Name Oregon

Job Title NEPA Program Coordinator, etc.

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Not sure what is meant by the term "screening". Oregon DOT follows FHWA's 2011 EJ & NEPA step-by-step guidance to address any potential impacts from transportation projects to low income and minority (EJ) communities. As the FHWA-EJ & NEPA subject matter expert for Oregon DOT for addressing impacts during the NEPA phase, I advise ODOT project teams and NEPA staff/consultants to use tools to get a first-glance idea of census block info, but then I (and FHWA) expect that project teams will target EJ communities with equitable engagement strategies and treat EJ communities and their service providers as project stakeholders; FHWA expects EJ members to have a voice and that their concerns are incorporated into transportation project designs.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

ODOT's NEPA and environmental staff, as well as consultants, have a wealth of "tools" available and more "EJ mapping" info is coming online all the time. However, these "screening tools" are only a broad-brush start to get a feel for how much more in-depth, targeted outreach and engagement will need to be planned for any transportation project that could have potential impacts to EJ communities. I would guess that the most used tool is likely EPA's EJScreen. I believe Oregon is working on an EJ mapping tool, but at this time it is incomplete.

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Census block information and targeted outreach and engagement strategies within/adjacent to the entire project area as relevant, especially in areas where property is likely needed to be acquired for the project. ODOT can use a variety of methods, as makes sense in the context of the project area, to identify EJ community members. Many times a discussion with the local jurisdiction is a good first step as a best practice to identifying EJ community members.

What percentile does your agency use as a threshold to identify minority block groups?

We do not use percentiles or thresholds. See above best practices. FHWA does not expect a

percentage/threshold approach to equitable engagement with EJ community members.

How does your agency identify low-income block groups?

Census data, local data. Again, this is a broad-brush first step and by no means constitutes a final EJ analysis.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

As mentioned above, "evaluating impacts" to EJ communities can only be done by equitable engagement with those EJ community leaders and members - as appropriate. This is a project-by-project case. The FHWA 2011 EJ & NEPA step-by-step guidance contains specific expectations and also includes plenty of flexibility to not be one-sided/rigid. The best practices are those where EJ communities are treated as people and not as "things to analyze" (such as historic resources, soil, air, etc.). The best way to assess impacts and any potential mitigation is to go to where the EJ community lives and have conversations with them (or with their service provider organizations, and/or local leaders). If EJ members believe an impact is adverse to them, we can work with them to try to find adequate mitigation - such as project redesign, offer services, offer vouchers, etc.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

ODOT and FHWA ORDIV have guidance for both ODOT-approved Programmatic CEs and FHWA-approved CEs (we call these PCEs and CEs; CEs can be more complex than PCEs; about 96% of all class 2 projects are PCEs). In general, if specific conditions as listed in the guidance (Section 426.3) exist, further EJ analysis may be warranted; however, if all listed conditions can be addressed negatively, there is no further EJ analysis warranted as meeting all those conditions relates directly to no impacts to EJ communities.

Our guidance is found at this external link to our NEPA Manual (see Section 426.3-4) [ps: this is an "organic" document and is continually updated from regular QA/QC reviews and recommendations to update the guidance, which I manage]:

https://www.oregon.gov/odot/GeoEnvironmental/Docs_NEPA_Manual/426.NEPA_Manual.pdf Link to the ODOT NEPA Manual website: <https://www.oregon.gov/odot/GeoEnvironmental/Pages/NEPA-Manual.aspx> All of our forms and guidance are posted on the above websites. To answer the question below, this link to the ODOT NEPA Program page contains 2 forms of interest for you in the Forms and Templates section of the page: 1. PCE Approval Form, 2. CE Closeout Form. The NEPA Manual guidance, Sections 426.3-4, describes how to address ODOT's EJ conditions and how to comply with FHWA EJ guidance in both of the forms:

<https://www.oregon.gov/odot/GeoEnvironmental/Pages/NEPA.aspx>

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

As mentioned above, there are myriad methods that various groups at ODOT use to engage with EJ community members within each of the FHWA program areas. In general, those methods are very well described in the 2012 FTA EJ Circular:

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_EJ_Circular_7.14-12_FINAL.pdf The most important "technique" is to engage early, in any manner that is acceptable/preferred to that particular EJ community. They are all different. However, the very BEST technique to ensure an agency (state DOT for example) is truly engaging with and understanding the issues that EJ communities face is to establish ongoing relationships and partnerships with not only the EJ communities themselves, but also with state health and human services, and housing development departments. The days of siloed agency roles when trying to address traditionally underserved people are over, ongoing partnerships and collaboration is essential now more than ever.

How satisfied are you with your agency's EJ screening protocols?

5 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Danielle Tetreau
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DOT Name MaineDOT
Job Title Environmental Team Leader (Environmental Specialist IV)

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Yes. Our process involves evaluating the scope of work, utilizing the EPA's EJ mapper to identify population blocks with 15% or more of the people as low income or minority. Other tools to assist with the evaluation include the CEJ Screening tool, and American Community Survey data.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

EJ Screen, CEJ Screening Tool

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Our basis is the standard federal poverty guidelines. We use the EJ Screen threshold to make that determination.

What percentile does your agency use as a threshold to identify minority block groups?

15%

How does your agency identify low-income block groups?

If 15% or more of the population is living below the federal poverty guidelines then we consider that to be a low income community.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

The first step is to determine if there are any ROW impacts as a result of the project. The next step is to determine if the effects would be permanent or temporary for construction.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

We are in the process of identifying scopes of work that would by the nature of the work and impacts have no effect.

Our guidance is available on our website:

<https://www.maine.gov/mdot/env/NEPA/guidance/index.shtml>

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

The majority of our projects are CE level scopes of work. The public involvement process relies primarily on social media to target ads for our public meetings. Our Bureau of Planning manages community advisory groups, there is a transportation planner assigned to various regions and manages communication and outreach with them directly.

How satisfied are you with your agency's EJ screening protocols?

4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name John Sherrill
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DOT Name Illinois Department of Transportation
Job Title Chief, Location and Environment Section

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

See attached.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

All. See attached

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Department of Health and Human Services poverty guidelines on the internet.

What percentile does your agency use as a threshold to identify minority block groups?

Generally, 25 percent, but we have the project team identify and evaluate impacts to single EJ residents and EJ businesses.

How does your agency identify low-income block groups?

Per U. S. Census data.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

Three-step process: Step 1. The Illinois DOT project team identifies all the impacts that Illinois DOT is aware of. Step 2. The project team repeatedly asks the impacted area (residents and businesses) what they identify as impacts, including both transportation related impacts and non-transportation related impacts. Step 3. A document or newsletter is produced that identifies ALL impacts and asks the residents and businesses if they agree that ALL impacts are identified.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

See attached.

If your agency uses a standardized form or document, please upload it below.



IDOT_EJAnalysisMemo_Att... .docx



IDOT_EJAnalysisMemo_Au... .docx



IDOT_EJ_AnalysisMemo_At... .docx

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

All the above, including going door-to-door.

How satisfied are you with your agency's EJ screening protocols?

4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Karla Sims
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DOT Name Arkansas DOT
Job Title Lead Public Involvement Specialist

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

As it pertains to the Environmental - Public Involvement process, we utilize EJ Screen, field observations, the local school districts Annual Report, contact community organizations and faith based institutions, and the Census.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

EJ Screen

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

The U.S. Census provides us with income and poverty percentages. The Annual Update of the Department of Health and Human Services poverty guidelines provides us with the a picture of the community and the potential need for additional outreach in EJ and Title VI communities.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

When low-income and/or minority populations are identified within a project study area, the Public Involvement section will conduct additional outreach. For example, identify community leaders to connect with that particular population, distribute flyers door to door, run ads on English/Spanish radio and local newspapers (print/online), and mail/email flyers. A small Neighborhood meeting may be offered to the low-income/minority population, if necessary.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

The Public Involvement section submits a Title VI report annually to the EEO Division. This document contains all of the meetings/hearings conducted for the year and what level of outreach was conducted for the identified minority or Title VI population.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

Public Involvement Meetings/Hearings, small Neighborhood meetings, door to door invites, minority radio PSA, and speaking with community leaders.

How satisfied are you with your agency's EJ screening protocols? 4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Corey Brown
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DOT Name Pennsylvania
Job Title Environmental Planner II

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Once EJ populations are identified in a project area, teams check to see if those groups will be impacted and what the impacts to the group will be. If there are impacts the next determination is if the impacts are adverse and disproportionate. This information is identified through a number of screening tools like EJ Screen and ACS data for some basic community information.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

EJScreen, ACS Data, Field Observations, Coordination with knowledgeable Parties

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

Using demographic data from ACS and EJScreen provide starting place for gathering information. Field Observations and Coordination with knowledgeable parties helps get a better understanding of the community.

What percentile does your agency use as a threshold to identify minority block groups?

If a group is present in a project area they are considered in the initial determination for EJ, there is not a minimum threshold, however that group may not be adversely and disproportionate.

How does your agency identify low-income block groups?

By using ACS and EJ Screen information to compare populations against the surrounding area. If a group meets the definition outlined in U.S. Department of Health and Human Services Poverty guidance then they are included in analysis for impacts.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

The analysis of impacts on EJ populations should identify and discuss both direct impacts and

indirect/cumulative effects that would result.

In evaluating potential disproportionate impacts on EJ communities, the relative distribution of adverse impacts between EJ and non-EJ populations is of importance. Disproportionality analysis must determine if:

1. the adverse direct, indirect and cumulative effects are predominately borne by EJ populations and/or
2. if the effects borne by EJ populations are appreciably more severe or greater than those effects borne by non-EJ populations.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

Project level EJ analysis and documentation begins during project scoping. All projects, with a few minor exceptions for some CE/ED actions, are required to perform project scoping and to document the results via a Scoping Document in the CE Expert System. If EJ populations are not present in the vicinity of a project, this should be documented in the appropriate section of the Scoping Document and your EJ analysis is considered to be complete for the scoping phase. If EJ populations are present this should be documented in the appropriate section of the Scoping Document and additional analysis should be performed to determine if there is potential for disproportionately high and adverse effects to EJ populations. Additionally, if EJ populations are present, any public involvement and outreach with/to EJ populations, either previously performed or to be performed, should be documented in the appropriate section of the Scoping Document.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

Public participation under NEPA involves two-way communications, with PennDOT receiving information, comments, and advice, as well as disseminating information on possible approaches, analyses, and decisions. This is particularly important when there are potential EJ issues involved. A good strategy involves a diverse array of techniques for conveying public information to reflect the variety of ways people access information. Some possible examples for public information materials are listed below:

- advertisements
- badges and buttons
- billboards
- brochures
- church bulletins
- community newsletters
- display boards
- ethnic specific media
- fact sheets
- fast food placemats
- fliers
- grocery bags
- placards
- magnets
- newsletters
- newspaper inserts and articles
- notices
- posters
- press releases
- radio announcements
- school handouts
- utility bill stuffers
- websites
- social media
- transit vehicle placards

How satisfied are you with your agency's EJ screening protocols?

4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Angel Reed
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DOT Name Virginia Department of Transportation
Job Title NEPA Programs Manager

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

VDOT documents its EJ approach in an Instructional & Informational Memorandum (IIM-ED-714.1), "Environmental Justice Identification, Outreach and Analysis Requirements." The intent of this document is to provide direction to complete outreach, identification and analysis of areas that meet the definition for an EJ community and determine potential impacts for the purposes of NEPA documentation. IIM-ED-714.1 is publicly available, and VDOT will share the IIM at a future subcommittee meeting.

As described in greater detail in subsequent responses, VDOT no longer uses thresholds to identify EJ populations in a project area and relies on data from EJScreen to determine whether minority or low-income populations are present in a project area. If EJ populations are present, impacts are evaluated in a stepwise process to determine whether there may be a disproportionately high and adverse effect.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

VDOT uses EJScreen to identify "People of Color" and "Low Income" populations at the Census block group level for areas within or adjacent to a project area. The Justice40 Transportation Disadvantaged Census Tracts (Historically Disadvantaged Communities) mapping tool may be used to supplement data obtained through EJScreen to provide additional detail on the communities in a project area.

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

VDOT uses EJScreen to identify "Low Income" populations, which is defined as the "percent of individuals whose ratio of household income to poverty level in the past 12 months was less than 2 (as a fraction of individuals for whom ratio was determined)."

What percentile does your agency use as a threshold to identify minority block groups?

VDOT no longer uses a threshold to identify minority block groups. If minority populations are present (as revealed by data from EJScreen and other relevant information sources), this constitutes an EJ

community and there is the potential for impacts.

How does your agency identify low-income block groups?

VDOT uses EJScreen to identify low-income populations at the Census block group level. VDOT does not designate individual Census block groups as low-income or not low-income based on this data; instead, the presence of low-income populations (or minority populations) constitutes an EJ community.

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

Yes, VDOT's IIM-ED-714.1 outlines the process for evaluating impacts as follows:

- 1) Assess the demographics of the population relative to a project area using EJScreen.
- 2) Determine how the project interacts with that population. Project documentation shall include an assessment of whether the project involves:
 - Major traffic disruptions
 - More than minor amounts of temporary or permanent right-of-way acquisition or more than limited displacements
 - Community disruptions
 - Disruption of emergency services
- 3) If a project involves any of the conditions listed above, assess and document whether the impact is borne predominantly by areas that meet the definition for an EJ community.
- 4) If a project is found to have DHAЕ to areas that meet the definition for an EJ community, appropriately document the finding and any necessary mitigation measures.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

VDOT documents the identification of EJ populations by downloading a .CSV file from EJScreen with the Census block group demographic data for the project area. VDOT documents the identification and analysis of potential impacts (including DHAЕ) in the CE form and may supplement that with a technical report or memorandum, as needed.

IIM-ED-714.1 is VDOT's EJ guidance for NEPA. VDOT will provide the IIM at a future subcommittee meeting.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

VDOT uses a variety of public engagement techniques to engage EJ populations in NEPA studies, including one-on-one meetings, small group meetings, community office hours, virtual public meetings, in-person public hearings, mail, e-newsletters, websites, and social media. VDOT reaches out to EJ populations directly through mail, and, as needed, phone calls and emails, to invite their participation in the NEPA process and seek their input on potential impacts and potential mitigation.

How satisfied are you with your agency's EJ screening protocols?

4 / 5



Environmental Justice Screening Survey

The South Carolina Department of Transportation (SCDOT) is developing a standardized process for screening impacts to environmental justice communities. The purpose of this survey is to identify a set of best practices for EJ screening that have been adopted by other State Departments of Transportation.

Employee Name Kevin Fleming
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DOT Name Connecticut
Job Title Transportation Planner II

Does your agency have a standardized process for screening impacts to EJ communities? If yes, please describe the key approaches and strategies that your agency uses to identify low-income and minority populations.

Our Office of Environmental Planning performs a cursory review of proposed projects to determine potential impacts to 4f resources, cultural resources, species, water resources, AQ, Noise, etc. and ultimately recommend a level of NEPA documentation. During this process we develop a demographic profile of the area using EJ Screen, and then provide that to the project design team. So, we have a standardized process for identifying EJ populations, but not necessarily analyzing impacts.

Which of the following applications (if any) does your agency utilize when screening for EJ impacts? EJScreen, STEAP, Climate and Economic Justice Screening Tool (from the Council on Environmental Quality), an In-house Agency-Specific Tool, Other (please specify)

EJ Screen
 In-house GIS Mapping utilizing American Community Survey Data

According to the Federal Highway Administration, "Low-Income" is defined as: A person whose median household income is at or below the Department of Health and Human Services poverty guidelines. Based on this definition, how does your agency access information about poverty within study areas?

We generally rely on EPA's EJ Screen Tool to determine the percentage of Low-income individuals in a census tract or block group

How does your agency identify low-income block groups?

We generally rely on EPA's EJ Screen Tool to determine the percentage of Low-income individuals in a census tract or block group

If low-income and/or minority populations are identified within a project study area, does your agency have a standardized practice for evaluating impacts to those communities? If yes, please describe this practice.

We currently do not have a very consistent way of performing further analysis to determine potential disproportionate/adverse impacts to EJ populations. We are currently working with our local FHWA office to write an EJ Analysis policy for Cat Ex level projects (99% of our projects). The idea would be to have a tiered system of analysis depending on the project type/potential impact, ranging from project types that are exempt from any type of EJ analysis to a full analysis. We are still working out

what that analysis would look like. We hope to have something in Spring 2023.

How does your agency document EJ-related analyses and findings on CE-level environmental documents?

Currently the Office of Environmental Planning develops a demographic profile and depending on the nature of that profile, project type, and potential impacts determines if the project has the potential for disproportionate/adverse impact to the EJ community. At this point is really the project reviewer making a judgement call using the information known about the area and project. If we determine there is potential for disproportionate EJ impacts, we draft a brief narrative and submit it to FHWA with the Cat Ex. We have only done a few of these and the process is not standardized. That narrative includes: project description, purpose and need, potential environmental impacts, public outreach methods targeting the EJ population, mapping, demographic profile of the area, how the team will mitigate any potential impacts to the EJ community, any alternatives considered, if any full takings/displacements are required, we will include the ROW relocation survey.

What techniques does your agency use to engage EJ populations in the transportation decision making process (e.g. community meetings, pop-up events, community advisory groups)?

We provide Community Based Organizations with information about projects and upcoming public meetings in English and translated into any other languages if there is a population with limited English Proficiency in the area. Advertise meetings on our website/ newspapers in English and Spanish. In person meetings are held in areas that are accessible by public transportation and in or as close to the affected neighborhood as possible.

How satisfied are you with your agency's EJ screening protocols?

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APPENDIX C

EVALUATION OF ONLINE ENVIRONMENTAL JUSTICE SCREENING APPLICATIONS

PROS

STEAP	EJSCREEN	CEJST (by CEQ)
Offers view of vehicle ownership.	Environmental justice indexes (11 of them)	See immediately how many categories a population is disadvantaged in.
Offers view of population in poverty by race.	Socioeconomic indicators (8 of them)	Clearly shows you when something is outside of an average percentile.
Offers view of other vulnerable populations or households (veterans, etc.)	Offers view of health disparities.	Categories include: climate change, clean energy and energy efficiency, clean transit...
Able to analyze populations within a radius of your choosing.	Climate change data (wildfire hazard potential, etc.)	sustainable housing, legacy pollution, clean water and wastewater infrastructure...
Offers view of employed population over the age of 16.	Offers view of critical service gaps.	health burdens, workforce development...
Offers view of educational attainment in citizens over the age of 25.	Allows for MANY more demographics to be viewed.	HS degree non-attainment, and higher education non-enrollment.
Offers view of household by size.	Ability to change color set	Each category above further broken down.
Offers view of households by household type for children under the age of 18.	Choose thematic or graduated symbol map.	Gives county, census tract, state, and population.
Offers view of households by household type.	Choose from 2015-2019 ACS or 2000 or 2010 Census	Allows view of methodology and data.
Offers view of monthly housing cost.	Choose from a variety of places to analyze (prisons, places of worship, schools, etc.)	Easy to navigate
	Drop a pin, draw an area, add a path, select block group, select tract, select city, select county, or more	
	Save session, measure, side by side comparisons , add shapefile, search geoplatform, add map services, print, and boundaries.	
	Includes food deserts.	

CONS

STEAP

EJSCREEN

CEJST (by CEQ)

Use of politically incorrect language (Hispanic, American Indian, etc.)

Health Disparities section only includes low life expectancy, heart disease and asthma. **Obesity** and other health issues are missing.

Beta site (Assuming this means it is incomplete?)

Have to click on whichever function you want to be using every time you want to use it.

Organized only by percentiles which isn't always helpful

“American Indian” section only broken down into four tribes.

Does not let you choose your own area boundaries.

“Hispanic” section only broken down into four nationalities, leaving 23% of the total population to identify themselves as “other.”

Population by sex only broken down into male and female, exclusionary.