

JACTS

Environmental Justice Analysis

15-1

Chapter 15

Environmental Justice Analysis

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The roadway and transit projects identified and programmed in the JACTS 2040 Long Range Transportation Plan must address the principles of Executive Order 12898 relating to Environmental Justice. Specifically, the plan must identify and address disproportionately high and adverse human health or environmental effects of its programs and policies on minority and low-income populations.

The basic principles addressed by the Environmental Justice analysis include:

- To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economics effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process, and
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

The methodology undertaken to analyze that the principles are being met entailed mapping census block group areas where the low-income (poverty) and minority population concentrations exceeded the population averages for the JACTS planning area (Jackson County) as a whole, overlaying the proposed LRTP projects and visually analyzing the potential impacts.

Definition of “Minority” for the Purposes of Environmental Justice

According to the U.S. DOT Order 5610.2, the following groups are to be considered when conducting an Environmental Justice Analysis:

1. **Black or African American**. A person having origins in any of the black racial groups of Africa (Figure 15-1a).
2. **Hispanic or Latino or Latina**. A person of Mexican, Puerto Rican, Cuban, Central American, South American, or other Spanish culture or origin, regardless of race (Figure 15-1b).
3. **Asian & Pacific Islander**. A person having origins in any of the original people of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands (Figure 15-1c).
4. **American Indian & Alaskan Native**. A person having origins in any of the original people of North America and who maintain cultural identification through tribal affiliation or community recognition (Figure 15-1d).

According to the 2010 U.S. Census, the countywide averages for the minority populations are as follows: African American 7.95%, Hispanic 3.02%, Asian 0.73%, and American Indian and Alaskan Natives 0.37%.

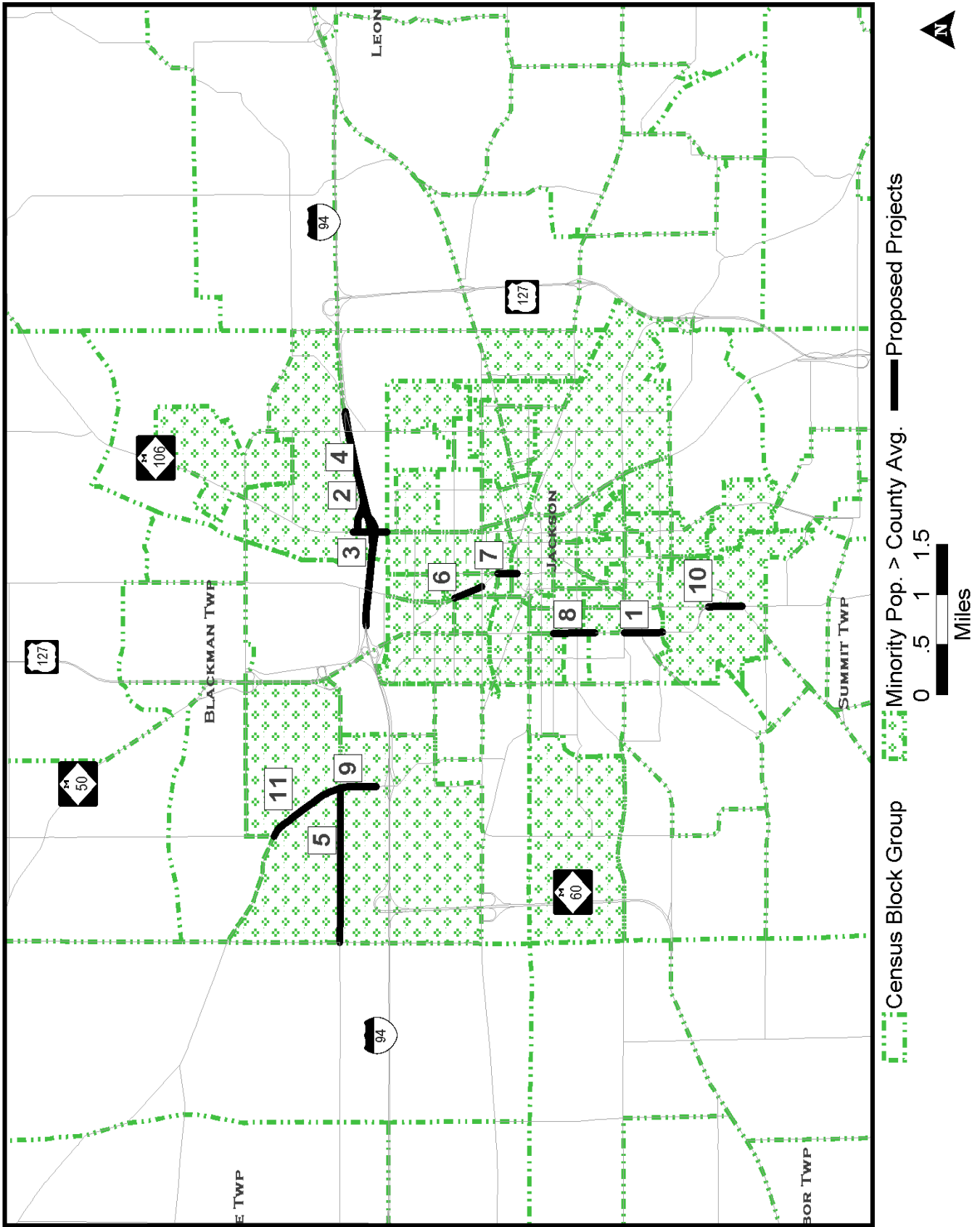


Figure 15-1a
Proposed Improve & Expand Projects

Blacks or African Americans

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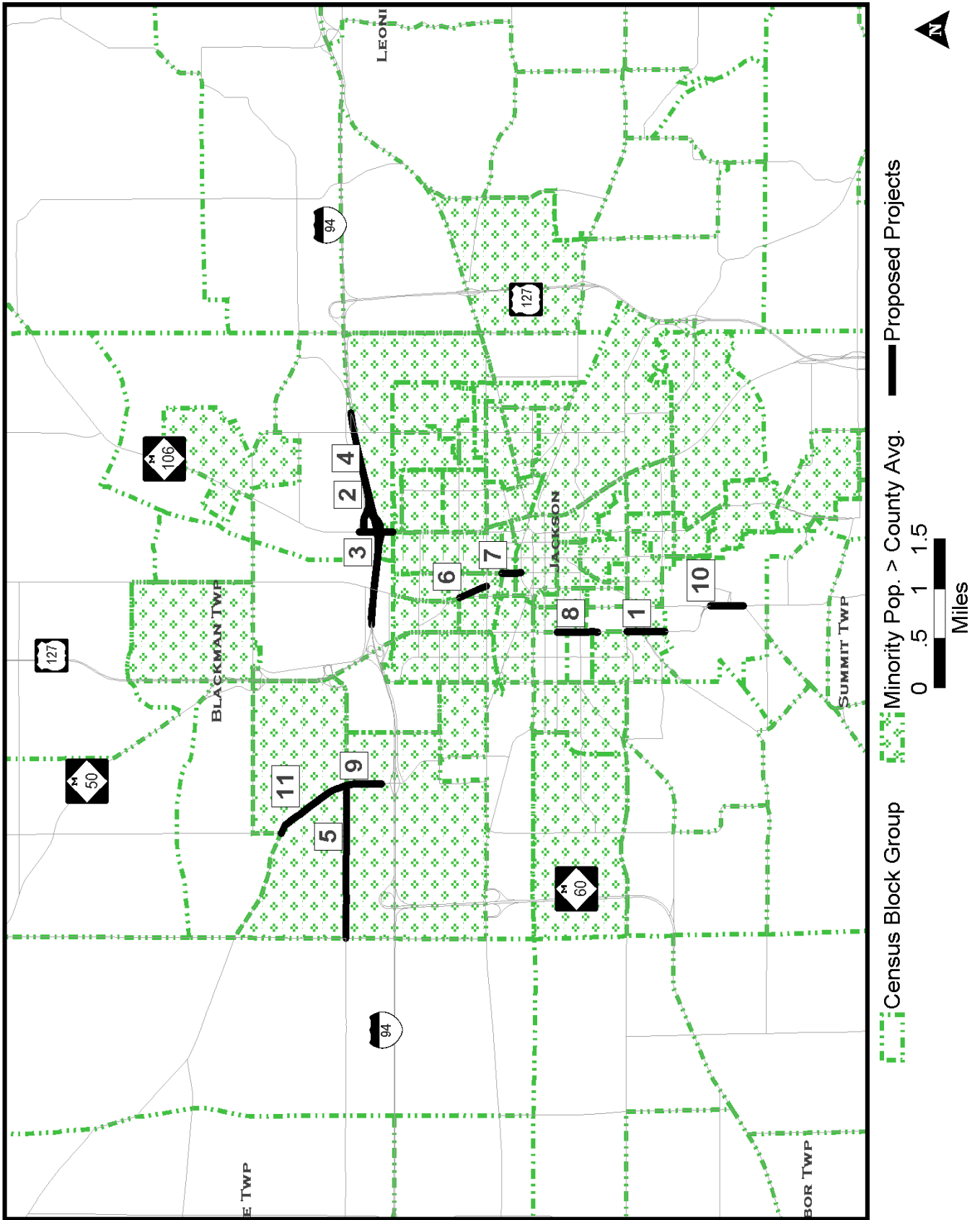


Figure 15-1b
 Proposed Improve & Expand Projects

Hispanics or Latinos & Latinas **JACTS**

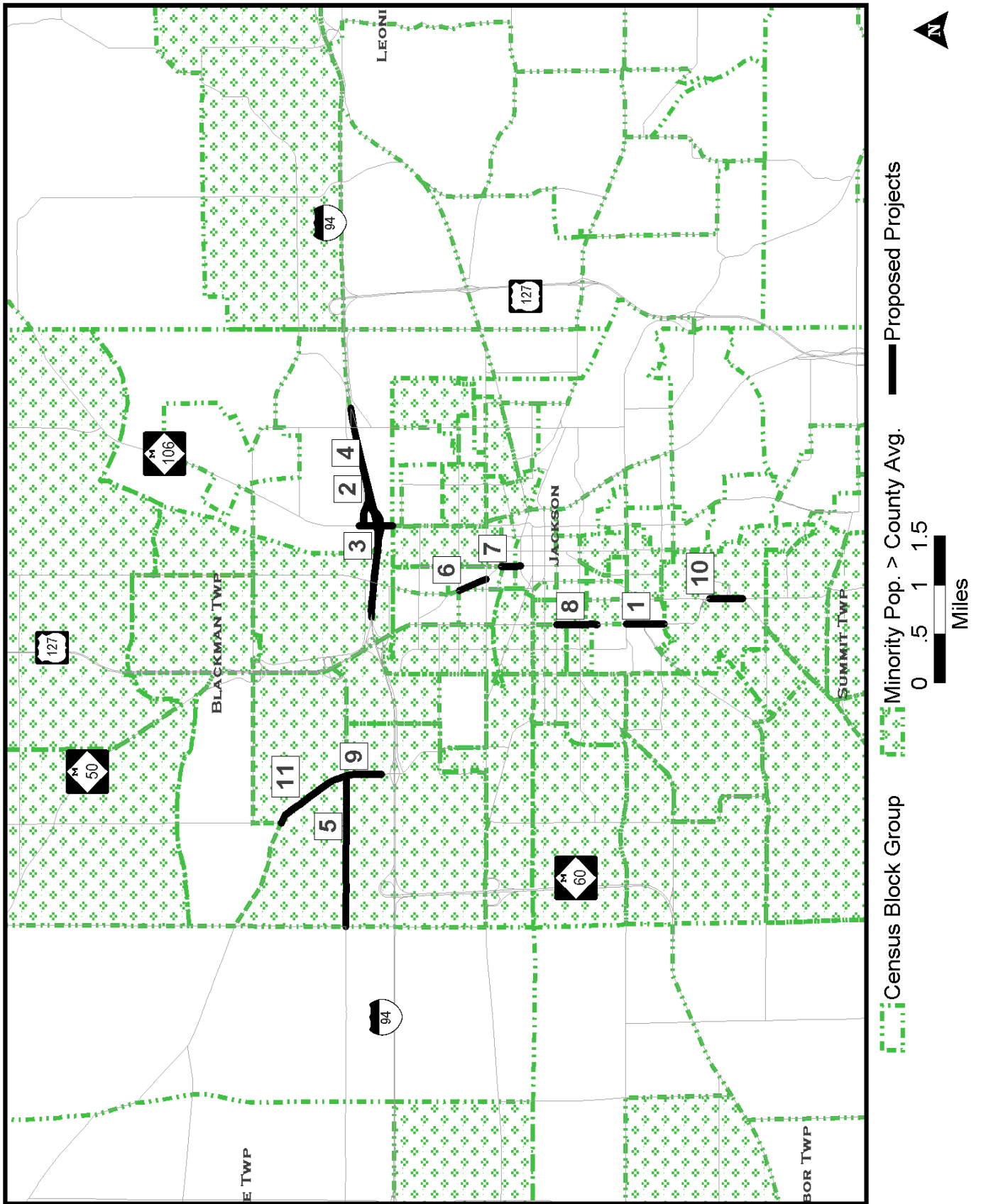


Figure 15-1c
 Proposed Improve & Expand Projects

Asian & Pacific Islanders

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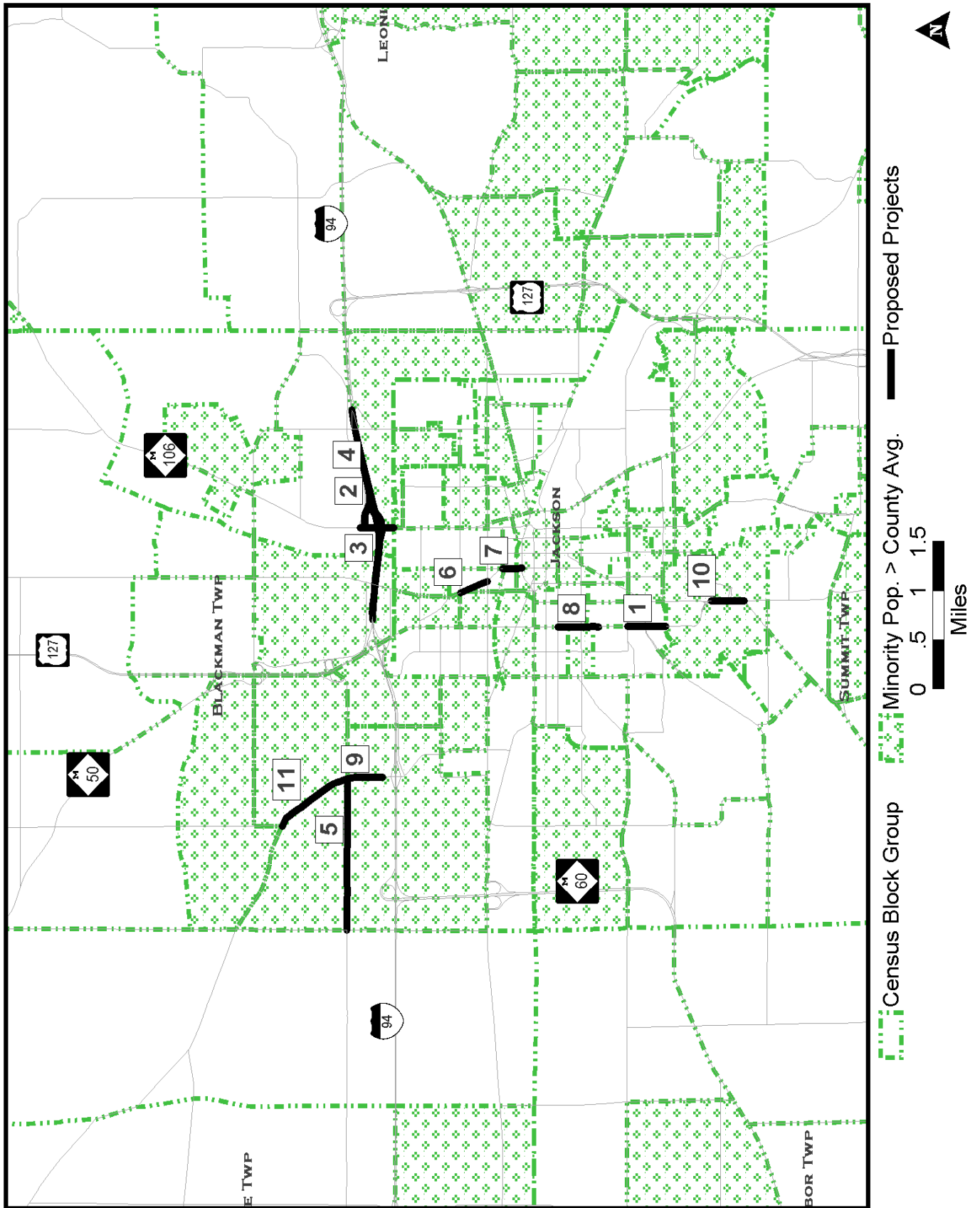


Figure 15-1d
Proposed Improve & Expand Projects

Definition of “Low Income” or “Individuals Living Below Poverty Level” for Purposes of Environmental Justice

The Office of Management & Budget (OMB) defines low income as a person whose household income is at or below the U.S. Department of Health and Human Services poverty guidelines. These guidelines are used as eligibility criteria for the Community Services Block Grant Program as well as a number of other federal assistance programs. According to the 2010 U.S. Census, 14.9% of Jackson County’s population falls below the national poverty threshold (Figure 15-1e).

The analysis of potential impacts centers on three major areas of concern:

Disproportionately high adverse impact to low-income/minority areas

Of the eleven (11) local and state roadway improve and expand (capacity) projects contained in the JACTS 2040 LRTP, seven (7) projects, or 63% of the improve/expand projects, are located within or adjacent to areas “equal to or exceeding” the county’s overall poverty levels. Total funding invested in these projects is estimated at approximately \$58,263,360. The projects include the reconstruction and realignment of the Cooper Street interchange at I-94 and the realignment and structure replacement over ConRail and the Grand River to accommodate the future proposed widening of I-94 as recommended in the *I-94 Freeway Modernization Study*.

The environmental reevaluation process for the I-94 bridge over the Conrail Railroad and the Grand River, the I-94 at Cooper Street interchange and the reconstruction/realignment project began in 2012. The final design of the Cooper Street Interchange affects several homes and businesses, and as of May 2013, the property owners have been contacted. A public meeting was held at the Blackman Township Hall on April 18, 2013. Any environmental impacts resulting from these projects will be mitigated according to federal and state laws. During project implementation, appropriate detour routes will be maintained to minimize delay and disruption.

For each of the identified minority populations, eleven (11) projects, or 100% of the total improve/expand (I/E) projects are located in, or adjacent to, African American minority areas; ten (10) or 90% of the I/E projects in Hispanic minority areas; nine (9) or 81% of the I/E projects are located within or adjacent to Asian minority areas; and eleven (11) or 100% of the total I/E projects are located within or adjacent to Native American minority areas. The I-94 projects have been identified and documented in the environmental reevaluation process noted in the above paragraph. Any environmental impacts will be mitigated according to state and federal laws.

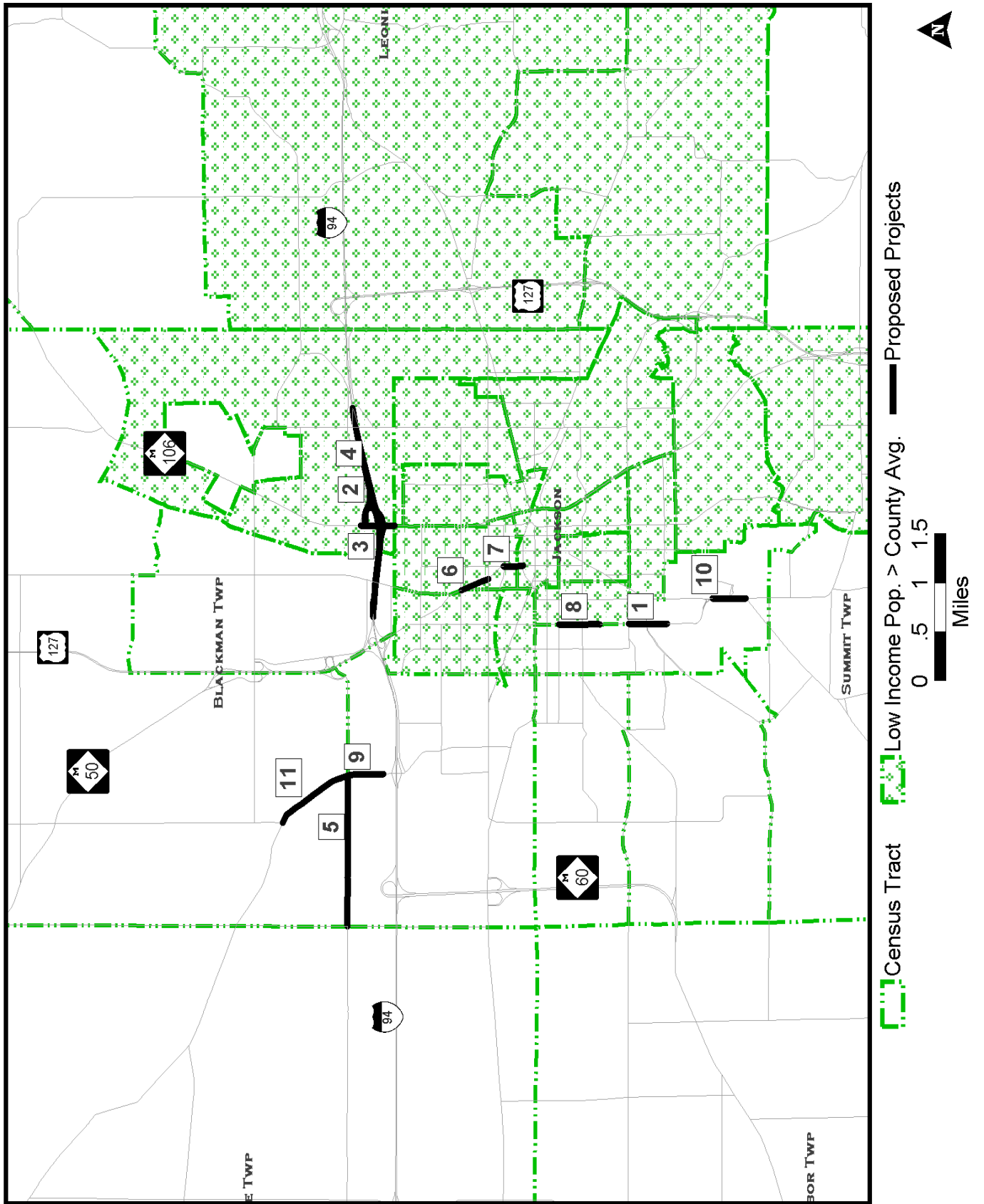


Figure 15-1e
Proposed Improve & Expand Projects

Impoverished Individuals

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Minimizing/blocking access of low income/minority areas to transportation

Minimizing access can be characterized as the permanent closing of streets or interchanges in order to accomplish the proposed capacity projects contained in the LRTP. The current list of I/E projects will not involve any permanent street or interchange closures. In fact, the proposed construction will improve the flow of traffic through these areas. Therefore, it is assumed that there will be limited or no blockage of access to the transportation system or loss of mobility as a result of implementing proposed projects.

Neglect of the transportation system in low income/minority areas

The JACTS study area is approximately 720 square miles and includes 19 townships and the city of Jackson. The targeted low income (% below the national poverty level) areas mapped cover approximately 20 percent of the county and the composite minority areas mapped cover almost 60 percent of the county. As noted earlier, of the 11 capacity projects included in the LRTP, seven (7) projects (63%) are located within or adjacent to the low-income areas, representing 91% all improve and expand project costs contained in the LRTP. In the identified minority areas, all 11 projects included in the LRTP are located within or adjacent to neighborhoods exceeding the countywide averages. Therefore, it has been determined that there is no neglect of investment in the transportation system in the low-income and minority areas.

Public Transit Investment

Public transit in Jackson County is provided by the Jackson Area Transportation Authority (JATA). The agency's fixed-route service area includes the city of Jackson and portions of the urbanized area and the Reserve-a-Ride program provides demand response service to all residents of the city and county. Reduced fares are available for the elderly, disabled and student populations. None of the proposed projects included in the LRTP restrict the access of residents to the public transit system services. Therefore, it has been determined that there is no neglect, reduction or delay in the receipt of transportation benefits by those residing in low income or minority areas. Maps illustrating how JTA routes serve minority and low-income populations in the Jackson Urbanized Area are also provided for review (Figures 15-2a, 15-2b, 15-2c, 15-2d, and 15-2e).

In conclusion, following adopted environmental justice procedures, this analysis finds that the proposed projects do not result in violations of Executive Order 12898. JACTS will continue to update and maintain the public participation mailing list, and continue to improve communication, coordination, education and involvement activities in order to reach the traditionally disadvantaged populations (including minority and low income) to ascertain and evaluate potential effects or impacts resulting from proposed projects.

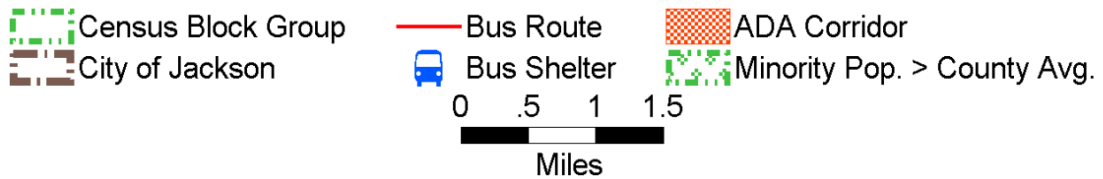
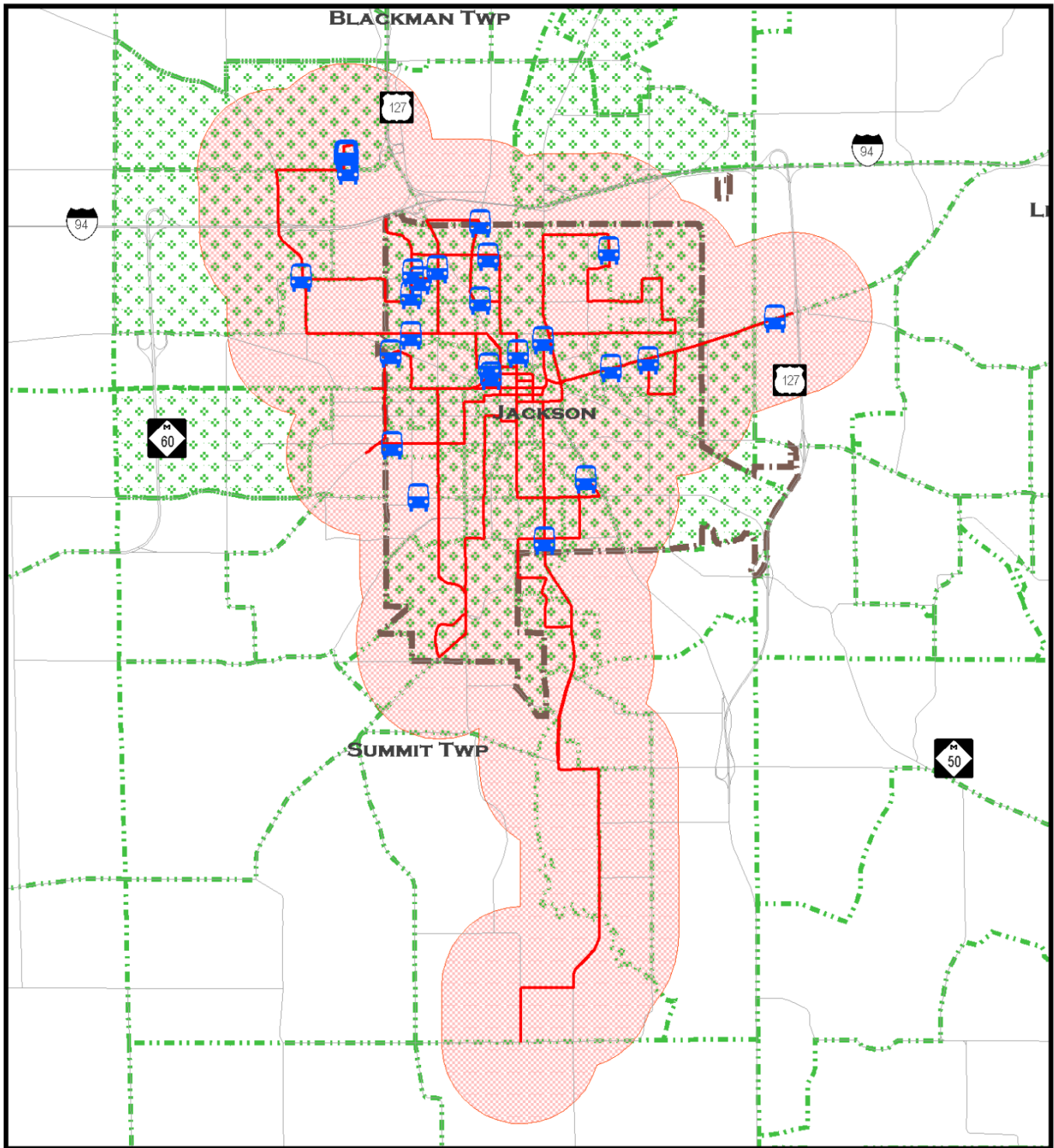


Figure 15-2a
 Jackson Area Transportation Authority (JATA) Routes
Blacks or African Americans

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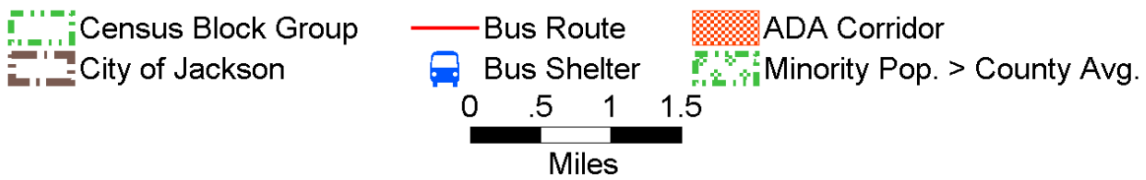
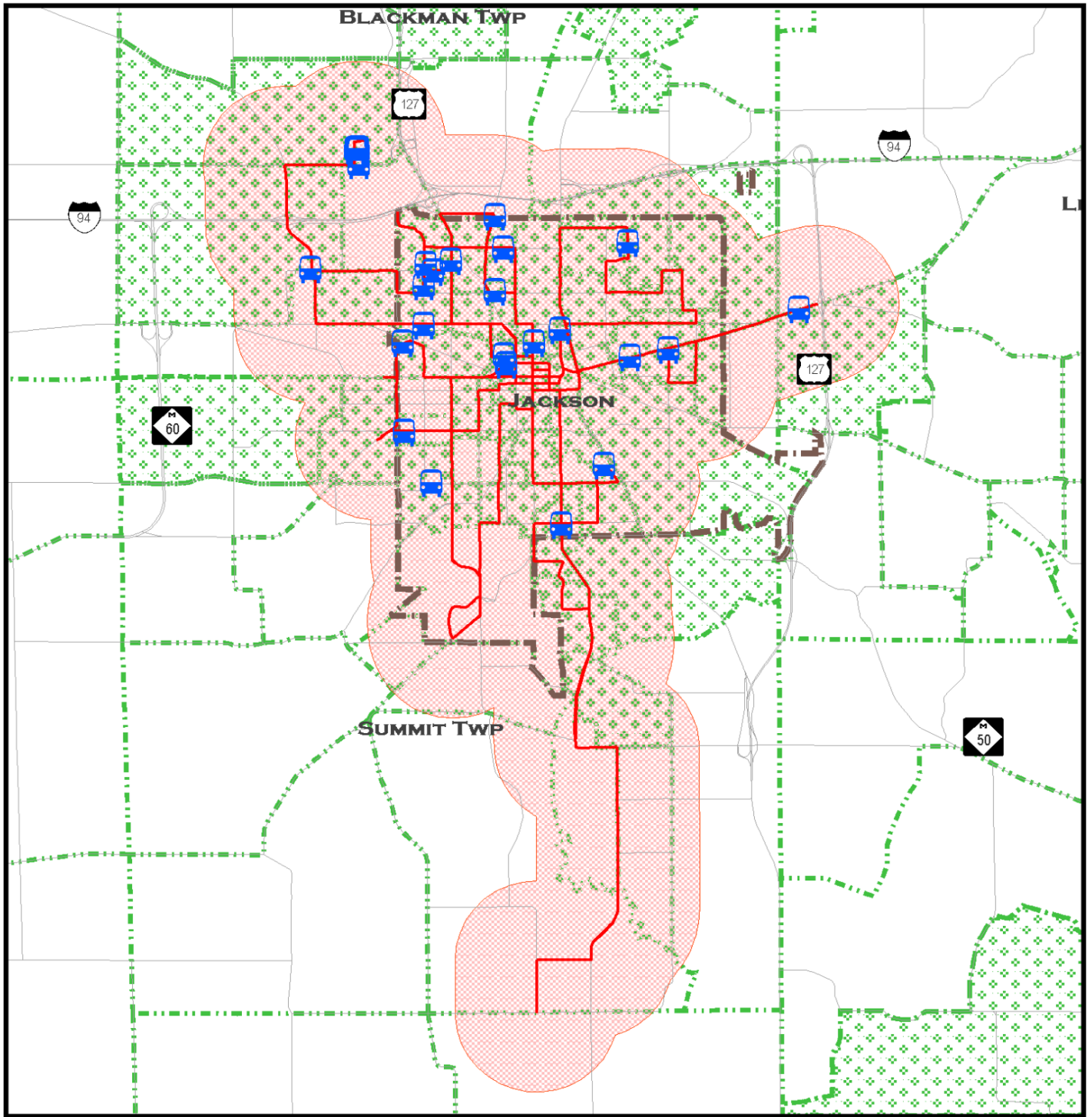


Figure 15-2b
 Jackson Area Transportation Authority (JATA) Routes
Hispanics or Latinos & Latinas

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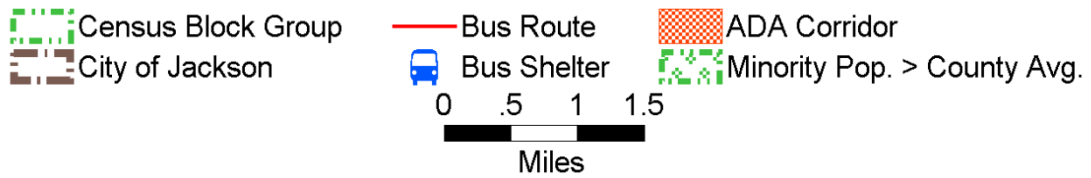
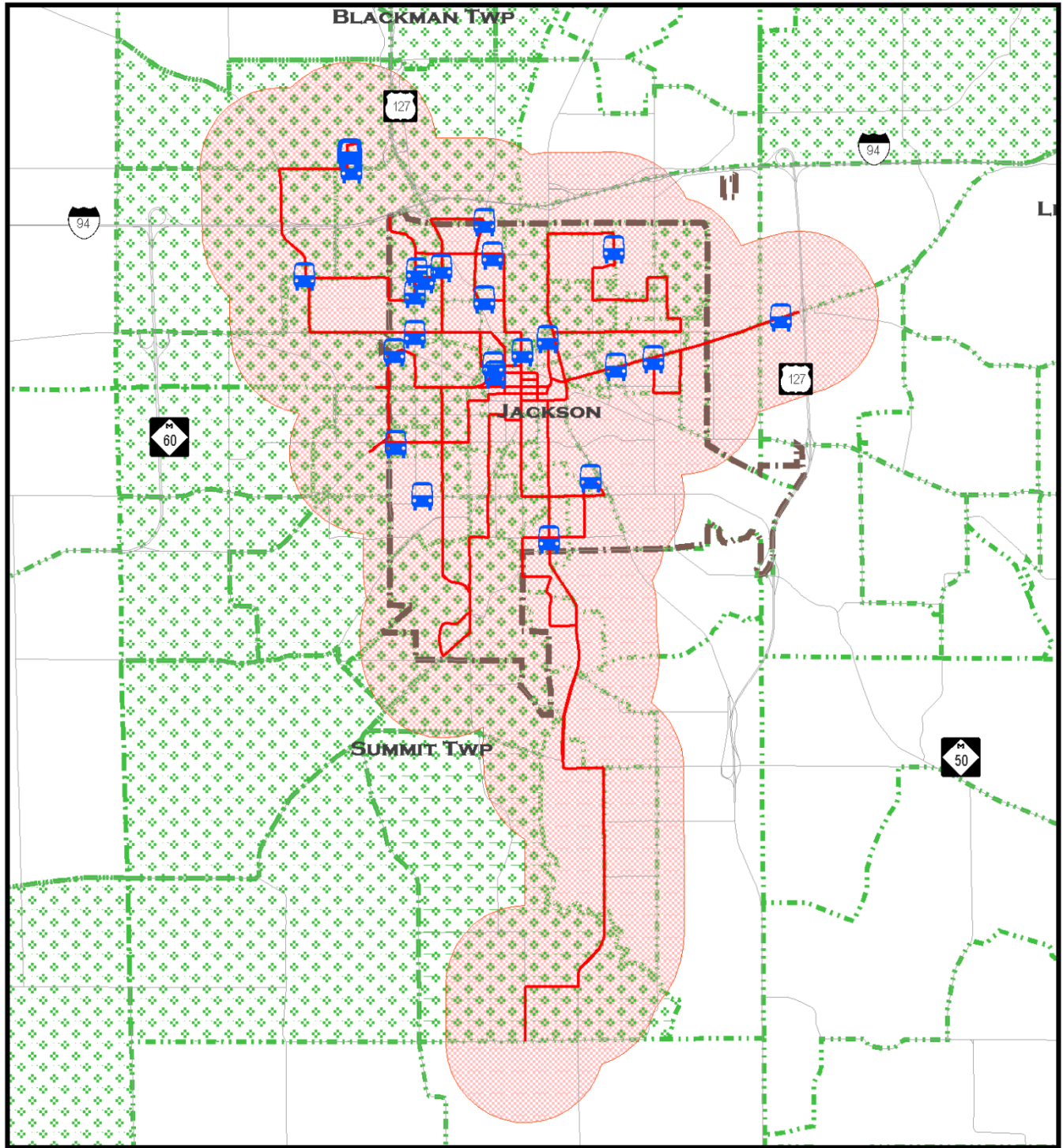


Figure 15-2c
 Jackson Area Transportation Authority (JATA) Routes
Asian & Pacific Islanders

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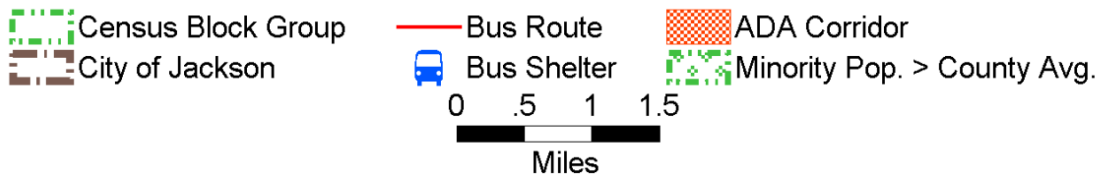
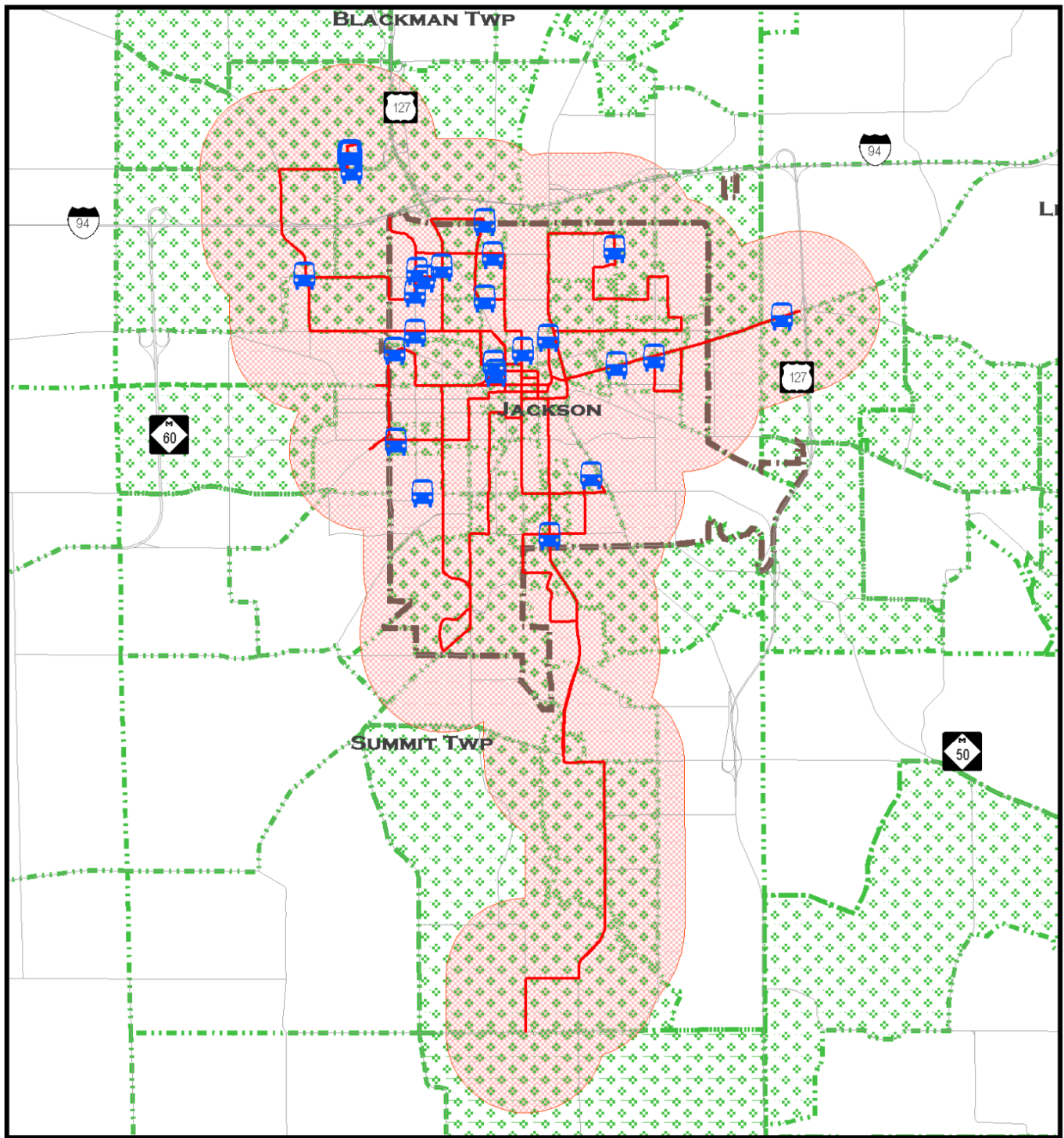


Figure 15-2d
 Jackson Area Transportation Authority (JATA) Routes
American Indians & Alaska Natives

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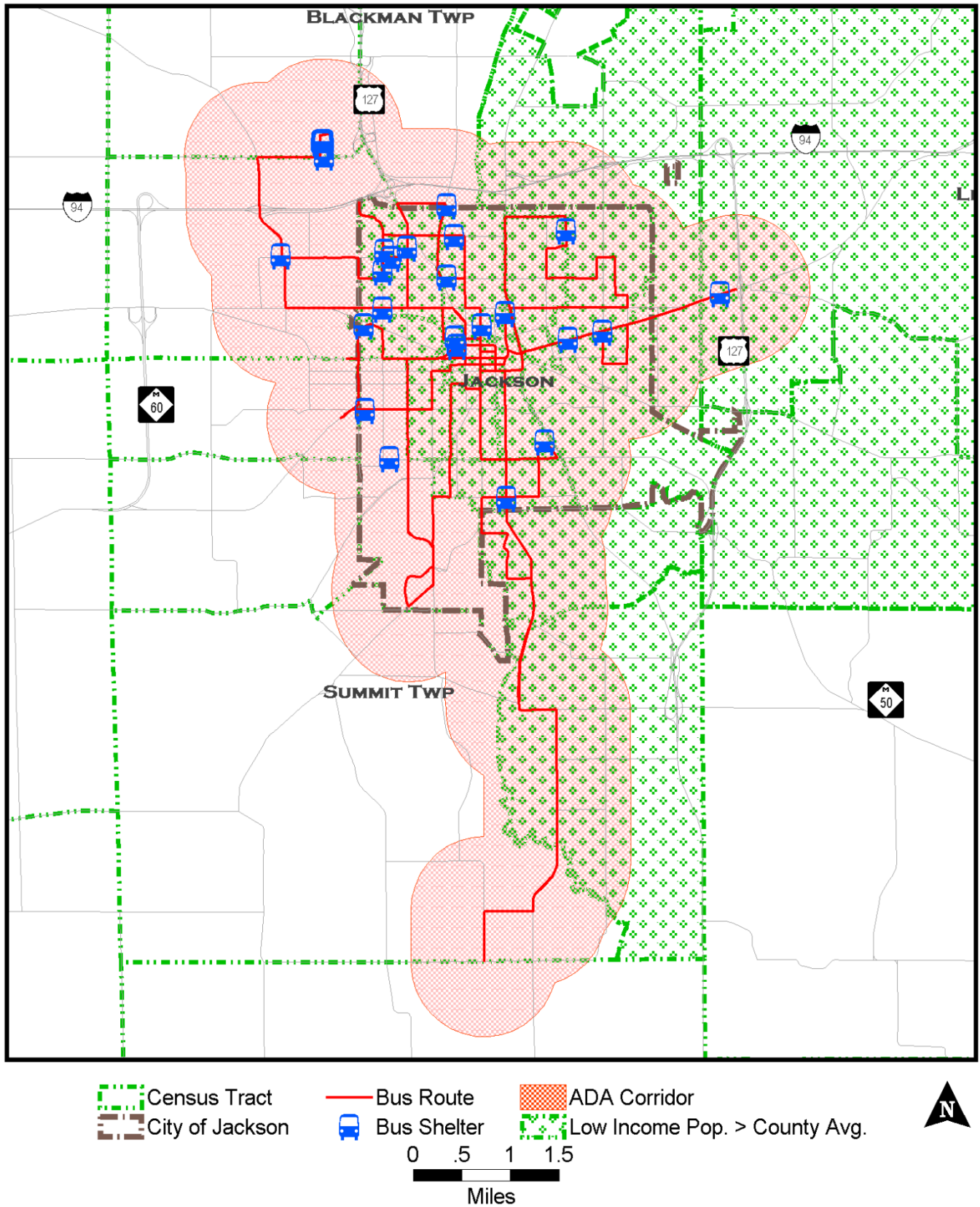


Figure 15-2e
 Jackson Area Transportation Authority (JATA) Routes
 Impoverished Individuals

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