

SOUTH JERSEY TRANSPORTATION PLANNING ORGANIZATION

ENVIRONMENTAL JUSTICE REPORT

March 22, 2010



**South Jersey Transportation Planning Organization
782 South Brewster Road, Unit B6
Vineland, New Jersey, 08361
www.SJTPO.org**



Table of Contents

I. Executive Summary.....	1
II. Environmental Justice Legislation.....	1
Title VI of the 1964 Civil Rights Act.....	2
Executive Order 12898.....	2
Executive Order 13166.....	2
DOT Order on Environmental Justice	3
III. Defining Environmental Justice Areas.....	3
IV. Statistical Analysis of Environmental Justice Areas	4
V. Assessing Major Planning Products	5
Transportation Improvement Program (TIP).....	5
Regional Transportation Plan (RTP).....	12
Public Involvement	13
Area-Wide Job Access and Reverse Commute Transportation Plan (JARC).....	14
Unified Planning Work Program	14

Table of Tables

Table 1 – Regional Thresholds for Traditional Environmental Justice Populations (EJTrad)	4
Table 2 – Profile of Traditional EJ Areas (by Block Group)	6
Table 3 – TIP Projects in Relation to Traditional EJ Areas (EJTrad).....	6
Table 4 – Comparing TIP Performance in EJTrad2X to EJTrad.....	7
Table 5 – TIP Distribution in Expanded Alternative EJ Areas (EJAlt).....	9
Table 6 – TIP Distribution in All EJ Areas Compared.....	9
Table 7 – TIP Projects in All EJ Areas.....	10
Table 8 – Detailed Profile of Areas Over Regional EJ Thresholds.....	15
Table 9 – Detailed Profile of Areas Twice Regional EJ Thresholds.....	15



Table of Figures

Figure 1 – Comparison of Block Groups, TIP Projects, and TIP Funding in EJ Areas.....	11
Figure 2 – Traditional Environmental Justice Areas and Future Transportation Improvements	16
Figure 3 – Areas of Racial Minority Concentration and Future Transportation Improvements	17
Figure 4 – Areas of Hispanic Minority Concentration and Future Transportation Improvements	18
Figure 5 – Areas of Low-Income Concentration and Future Transportation Improvements.....	19
Figure 6 – Expanded Alternative Environmental Justice Areas and Future Transportation Improvements	20



I. Executive Summary

It is imperative that we plan to incorporate environmental justice into our planning process, both as a requisite from Federal guidance, but also to ensure that our process is as effective as possible. This report describes the results of an analysis of our plans and processes from the lens of environmental justice. These products include the Transportation Improvement Program, Regional Transportation Plan, Public Involvement documents, Job Access and Reverse Commute Plan, and the Unified Planning Work Program. We find that our planning products meet the requirements for environmental justice as called for by Title VI of the 1964 Civil Rights Act, Federal Highway Administration guidance, and Executive Orders pertaining to the MPO public process.

Based on these principles and specifically on FHWA guidance¹, the following are the Goals and Procedures that the SJTPO will pursue to address environmental justice needs.

- Goal 1** – Make better transportation decisions that meet the needs of all people.
- Goal 2** – Design transportation facilities that fit more harmoniously into communities.
- Goal 3** – Enhance the public-involvement process
- Goal 4** – Enhance analytical capabilities to ensure that planning products and programs comply with Title VI.
- Goal 5** – Partner with other public and private programs to leverage transportation-agency resources to achieve a common vision for communities.
- Goal 6** – Minimize and/ or mitigate unavoidable impacts

II. Environmental Justice Legislation

The term “*environmental justice*” was created by people concerned that everyone within the United States deserves equal protection under the country’s laws. The Federal Highway Administration (FHWA), Title VI, and numerous other agencies, pieces of legislation, and Executive Orders establish numerous objectives, which MPOs such as the SJTPO must follow throughout the transportation planning process.

The principles of environmental justice in transportation planning have evolved and expanded based on numerous legislative and executive actions. Title VI of the 1964 Civil Rights Act served as the beginning of environmental justice followed by Executive Order 12898 in 1994, Executive Order 13166 in 2000 as well as orders from the Federal Highway Administration (FHWA).

Metropolitan Planning Organizations (MPOs) serve as the primary forum where State DOTs, transit providers, local agencies, and the public develop local transportation plans and programs that address a metropolitan area's needs. MPOs can help local public officials

¹ FHWA. An Overview of Transportation and Environmental Justice. May 2000.
<<http://www.fhwa.dot.gov/environment/ej2000.htm>>.



understand how Title VI and environmental justice requirements improve planning and decision making. The SJTPO, serving as the MPO for South Jersey seeks to put in place a successful process for environmental justice in the transportation planning process for the region. A successful environmental justice process will meet the goals, previously stated, to ensure that all groups are equally considered and involved in the process.

Title VI of the 1964 Civil Rights Act

Title VI of the 1964 Civil Rights Act serves as the first introduction of environmental justice into Federal policy, including transportation planning. It states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Title VI bars intentional discrimination as well as disparate impact discrimination (i.e., a neutral policy or practice that has a disparate impact on protected groups).²

Executive Order 12898

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low Income Populations, was signed by President Clinton in February 1994. This Order reinforced the requirements of Title VI of the 1964 Civil Rights Act and focused Federal attention on the environmental and human health conditions in minority and low income communities. SJTPO is guided by three principles of Order 12898:

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

Executive Order 13166

Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, was signed by President Clinton in August 2000. Order 13166 requires Federal agencies and any other entity that receives federal funds via grants, contracts, or subcontracts to make their activities accessible to persons with Limited-English Proficiency (LEP). Persons with Limited-English Proficiency are those with a primary or home language other than English

² FHWA. Implementing Title VI Requirements in Metropolitan and Statewide Planning. 07 October 1999. <<http://www.fhwa.dot.gov/environment/ejustice/ej-10-7.htm>>.



who must, due to limited English fluency, communicate in that primary language if they are to have an equal opportunity to participate effectively in or benefit from any aid, service, or benefit in federally funded programs and activities.

DOT Order on Environmental Justice

The DOT Order on Environmental Justice in Minority Populations and Low-Income Populations is an order that lays the out the process to incorporate the environmental justice principles in Executive Order 12898 into existing programs, policies, and activities. This order specifies that environmental justice practices will address persons belonging to a number of specific groups, which were incorporated into the SJTPO environmental justice groups previously mentioned, and including Black, Hispanic, Asian, American Indian or Alaska Native, Native Hawaiian or other Pacific Islander, and Low-Income.³

III. Defining Environmental Justice Areas

Whereas Executive Order 12898, and subsequent DOT orders only explicitly require the location and analysis of effects on minority populations and households in poverty, due to unique challenges among numerous different groups it was important to specifically identify an expanded set of disadvantaged populations in the SJTPO region. It is important that no group experience a greater burden or reduced benefit from the regional transportation system. To accomplish this more effectively it is necessary to recognize an expanded set of disadvantaged populations to help ensure that neither explicit nor disparate discrimination occurs.

The **traditional environmental justice population (EJTrad)**, as defined by Federal guidance includes Low-Income and Minority Populations, defined in greater detail below³.

- **Racial Minority population** – For the purposes of this report, racial minority population includes any non-white individual, inclusive of the populations designated in the DOT Order on Environmental Justice in Minority Populations and Low-Income Populations, indicated below.
 - **Black** – a person having origins in any of the black racial groups of Africa.
 - **Asian** – a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
 - **American Indian and Alaskan Native** – a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.

³ Department of Transportation. Order to Address Environmental Justice in Minority Populations and Low-Income Populations. 15 April 1997. <http://www.fhwa.dot.gov/environment/ejustice/dot_ord.htm>.



- **Native Hawaiian or Other Pacific Islander** – a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **Hispanic Minority population** – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- **Low-Income Households** – a household whose household income (or in the case of a community or group, whose median household income) is at or below the U.S. Department of Health and Human Services poverty guidelines.

The SJTPO also recognizes an expanded set of environmental justice populations, which represents a number of additional populations, which may also experience greater burdens or fewer benefits from the regional transportation network. This will be discussed in greater detail in a later section.

IV. Statistical Analysis of Environmental Justice Areas

In order to locate concentrations of environmental justice populations, thresholds needed to be developed. For the SJTPO, a **traditional environmental justice area (EJTrad)** is defined as block groups that meet or exceed the regional threshold for environmental justice, based on the official definition for environmental justice groups, which includes, Low-Income and Minority populations. To be considered an environmental justice block group, it only needs to exceed the regional threshold for one of the recognized environmental justice populations.

The threshold percentage is calculated for each EJ population group. This threshold percentage is compared to each block group in the region in order to determine if the block group is EJ-sensitive. Looking at Racial Minority for example (see 1a in Table 1) by taking the Racial Minority population for the entire region (1b) and dividing it by the total population of the region (1c), we arrive at a threshold population (1d). This percentage, 26.6 percent, is used as a threshold; any block group with a Racial Minority population over 26.6 percent is considered an EJ population for Racial Minority concentration.

This was done for each traditional EJ population group (Racial Minority, Hispanic Minority, and Low-Income Households). Indicated in Table 1, below is a list of the regional thresholds for each traditional EJ population group.

Traditional Environmental Justice Population	SJTPO Pop	EJ Pop	Threshold (% of Pop)
(1a) Racial Minority Population	(1c) 565,601	(1b) 150,596	(1d) 26.6%
Hispanic Minority Population (any race)	565,601	64,428	11.4%
Low-Income Households	210,610	11,813	5.6%



V. Assessing Major Planning Products

Transportation Improvement Program (TIP)

The SJTPO Transportation Improvement Program (TIP) reflects the transportation capital improvement priorities of the South Jersey region and serves as the link between the transportation planning process and implementation. It includes a list of transportation projects and programs, scheduled for implementation over a four-year period, which must be consistent with the goals and policies of the RTP. While inclusion in the TIP does not guarantee funding, it is an essential step in the authorization of funding for a project. Getting a project on the TIP is a critical step towards securing funding and implementation, therefore, it is important to ensure that all groups in the SJTPO region understand and have access to the TIP process, including representatives from low-income and minority communities. By analyzing the distribution of TIP projects, it can be determined if it complies with Title VI, Executive Order 12898 and 13166, and DOT Orders.

In the SJTPO region, TIP money and projects have been distributed equitably. This is based on the following test: The number of projects within EJ areas should reflect the number of EJ areas in the region. Also the amount of funds spent in EJ areas as a percentage of the total, should reflect the EJ area population as a percentage of total population. The primary measurement is against the Traditional EJ Areas (EJTrad), which are based on the official EJ class definitions within Federal regulations. However, to gain a better, and more specific understanding of the equity issues in the Region, this analysis looks at EJTrad, as well as Expanded Alternate EJ Areas (EJAlt), furthermore, both of these Areas are viewed at double their thresholds (EJTrad2X) and (EJAlt2X), this gives a picture of the highest concentrations of EJ populations in the region. Against all of these measures, SJTPO TIP funds and projects are distributed equitably.

TIP Projects Measured Against Traditional EJ Areas (EJTrad)

There are 402 total block groups in the SJTPO region and 204 (50.7 percent) of those block groups fall into a traditional environmental justice area. There are 544,955 total people in the SJTPO region and 273,943 people within EJ block groups, or 50.3 percent of people in the SJTPO region that live within EJ block groups. It is reasonable to assume that 50.3 percent of TIP projects and funds will fall within or make contact with EJ block groups. In practice, 61.9 percent of TIP projects fall within EJ block groups and 63.5 percent of funding, well above the 50.3 percent threshold.

An EJ block group is defined to be a block group that meets or exceeds the regional threshold for one of the official EJ populations, which include Racial Minority, Hispanic Minority, and Low-Income Households. The regional threshold is simply defined as the average population percentage of a group within the SJTPO region.

The 2008 – 2011 TIP was reviewed for projects that were considered to improve local safety, preserve the existing roadways, or enhance the local transportation system, and then were



mapped. Projects were categorized as either a roadway improvement, or as an intersection/interchange improvement. This information is displayed atop the EJ populations throughout the region (see Figures 2-6). Areas that surpass traditional EJ thresholds for the region are profiled in Table 2, and in greater detail in Table 8 and 9 at the end of this document. Table 2 indicates that 204 (2a) Block Groups out of 402 are EJ Block Groups, or 50.7 percent (2b). It also shows that 273,943 (2c) people live within Block Groups that meet or exceed the definition for Traditional EJ Populations, or 50.3 percent (2d) of the 565,601 people that live within the SJTPO region.

	Racial Minority Block Groups	Hispanic Minority Block Groups	Low-Income Block Groups	Total Minority/ Low-Income Block Groups (EJTrad)
Number of EJ Block Groups	137	120	168	(2a) 204
Total SJTPO Block Groups	402	402	402	402
<i>Percent of Total</i>	<i>34.1%</i>	<i>29.9%</i>	<i>41.8%</i>	(2b) <i>50.7%</i>
Population of EJ Block Groups	200,033	170,353	211,281	(2c) 273,943
Total SJTPO Population	565,601	565,601	565,601	565,601
<i>Percent of Total</i>	<i>36.7%</i>	<i>31.3%</i>	<i>38.8%</i>	(2d) <i>50.3%</i>

If a project was located partially or completely within a block group, it was assumed to benefit that population. To determine a fair distribution of projects, the percentage of projects within, or partially within, an EJ block group were compared to the percentage not within or partially within EJ block groups. The SJTPO 2008-2011 TIP includes 21 highway projects totaling \$605.75 million in total funding. Out of those 21 projects, 13 (3c) were in or connected directly to at least 1 identified environmental justice community, and out of \$605.75 million in total funding, \$384.70 million (3a), or 63.5 percent (3b) is within an EJ community. Table 3 indicates the percentage of funding relative to traditional EJ Areas. 61.9 percent (3d) of projects are within traditional EJ Areas (EJTrad), and 63.5 percent of total TIP funding is within the same area.

	Within Traditional EJ Areas (EJTrad)	Outside Traditional EJ Areas (Not EJTrad)
TIP Funding in Block Groups (\$ Millions)	(3a) 384.70	221.05
Total SJTPO TIP Funding (\$ Millions)	605.75	605.75
<i>Percent of Total</i>	(3b) <i>63.5%</i>	<i>36.5%</i>
TIP Projects in Block Groups	(3c) 13	8
Total SJTPO TIP Projects	21	21
<i>Percent of Total</i>	(3d) <i>61.9%</i>	<i>38.1%</i>



Thirteen TIP projects were in block groups that exceeded regional thresholds for at least one traditional environmental justice population. Table 7 shows an itemized list of each TIP[¶] projects, showing the specific areas to which they benefit and the total investment in each area. According to Table 7, \$384.70 million (63.5 percent) of total 2008 – 2011 TIP funding is within one of the three areas that make up Traditional EJ Areas (EJTrad).

Using the regional threshold as a metric and comparing the ratio of total TIP projects with those in EJ communities, the SJTPO has evenly distributed projects and funding across the region. Considering every project beneficial that it is within or directly connected to a community, either due to increased safety, improved traffic flow, or reduced congestion, it could be said that the SJTPO has had a total positive impact upon the communities of concern in the South Jersey region, while at the same time greatly improving mobility and access for the region as a whole.

TIP Projects Measured Against Double Traditional EJ Threshold (EJTrad2X)

This section analyzes TIP performance against a stricter definition of the environmental justice threshold. It will show that a more restrictive EJ definition will result in fewer block groups as well as population within EJ areas as well as fewer TIP projects and funding that serve this reduced, however more concentrated EJ area. This analysis will show that in these areas, where environmental justice concerns are the greatest, TIP project and funding distribution meets or exceeds the proportion of block groups within these areas.

In order to identify areas where environmental justice concerns are the greatest, this analysis also looks at areas with significantly higher concentrations of environmental justice populations. This higher concentration, EJTrad2X is defined as block groups that meet or exceed **twice** the regional threshold for environmental justice, based on the **official definition for environmental justice** groups, which includes, Low-Income and Minority populations. This higher concentration (EJTrad2X) is profiled next to the lower traditional threshold (EJTrad) in Table 4, below.

	(4a) EJTrad	(4b) EJTrad2X
Number of EJ Block Groups	204	76
Total SJTPO Block Groups	402	402
<i>Percent of Total</i>	<i>50.7%</i>	<i>18.9%</i>
TIP Projects in EJ Block Groups	13	6
Total SJTPO TIP Projects	21	21
<i>Percent of Total</i>	<i>61.9%</i>	<i>28.6%</i>
TIP Funding in EJ Block Groups (\$ Millions)	384.70	46.99
Total SJTPO TIP Funding (\$ Millions)	605.75	605.75
<i>Percent of Total</i>	<i>63.5%</i>	<i>7.8%</i>

[¶] For detailed project description, visit <<http://www.sjtpo.org/FY08%20TIP-Section%20II-Highway%20Projects.pdf>>.



Table 4 indicates that by making the threshold twice the average, the number of Traditional EJ census blocks decreases, from 204 (EJTrad) to 76 (EJTrad2X). This also impacts the number of projects that are in the EJ census blocks, from 13 (EJTrad) to 6 (EJTrad2X) and the dollar amount spent on TIP projects in the EJ census blocks, from \$384.70 million (EJTrad) to \$46.99 million (EJTrad2X). The official measure by which EJ equity is determined is against the EJTrad definitions, this EJTrad2X definition is used primarily to identify the highest concentrations of EJ populations, against this measure, SJTPO TIP funds and projects are still distributed equitably.

TIP Projects Measured Against Expanded Alternate EJ Thresholds

For the purposes of this analysis, SJTPO staff also recognizes an **expanded set of alternative environmental justice populations (EJAlt)** to include a number of groups in addition to the traditional EJ populations, which may also experience greater burdens or fewer benefits from the regional transportation network. In addition to the traditional environmental justice populations, this group includes block groups that meet or exceed the regional threshold for the following populations.

- **Elderly population** – For the purposes of this report, elderly population includes any individual age 65 and over.
- **Zero-Vehicle Households** – The data on vehicles available were obtained from answers to long-form questionnaire Item 43 of the 2000 Census, asked on a sample basis at occupied housing units. These data show the number of passenger cars, vans, and pickup or panel trucks of 1-ton capacity or less kept at home and available for the use of household members.
- **Limited-English Proficiency (LEP) populations** – Persons with Limited-English Proficiency are those with a primary or home language other than English who must, due to limited English fluency, communicate to others effectively in that primary language if they are to have an equal opportunity to participate effectively in or benefit from any aid, service, or benefit in federally funded programs and activities.

Similar to traditional environmental justice groups, to identify areas where environmental justice concerns are the greatest, this analysis also looks at areas with significantly higher concentrations of alternative environmental justice populations (**EJAlt2X**). This higher concentration, EJAlt2X is defined as block groups that meet or exceed **twice** the regional threshold for environmental justice, based on an **expanded set of affected populations**, including Low-Income, Minority, Elderly, Zero-Vehicle, and Limited English Proficient (LEP) populations.

This expanded alternative environmental justice definition will be referred to as EJAlt. Table 5 indicates that when the threshold is increased from the average to twice the average for the EJ Alternative Expanded definition, there is a narrowing in the EJ areas and the impact that the



projects have on them. Going from Column 5a (EJAlt) to 5b (EJAlt2X) there is a decrease in block groups, from 336 (EJAlt) to 135 (EJAlt2X), the number of TIP projects impacting the EJ areas decrease from 16 (EJAlt) to 7 (EJAlt2X), and the TIP funding declines from \$569.54 million (EJAlt) to \$518.37 million (EJAlt2X). The official measure by which EJ equity is determined is against the EJTrad definitions, these EJAlt and EJAlt2X definitions are used primarily to identify the other concentrations of disadvantaged populations, however against these measures, SJTPO TIP funds and projects are distributed equitably.

	(5a) EJAlt	(5b) EJAlt2X
Number of EJ Block Groups	336	135
Total SJTPO Block Groups	402	402
<i>Percent of Total</i>	76.2%	33.6%
TIP Projects in EJ Block Groups	17	11
Total SJTPO TIP Projects	21	21
<i>Percent of Total</i>	80.9%	52.4%
TIP Funding in EJ Block Groups (\$ Millions)	581.91	539.35
Total SJTPO TIP Funding (\$ Millions)	605.75	605.75
<i>Percent of Total</i>	96.1%	89.0%

TIP Performance Measured Against All EJ Threshold Definitions

It is now possible to look at the four definitions together (Table 6, Table 7, and Figure 1). As the threshold becomes higher (5a v. 5b) due to the more restrictive definition, the number of alternative EJ block groups decreases, from 336 (EJAlt) to 135 (EJAlt2X). Additionally, as the definition narrows, from the alternative (4a) to the traditional (4b, more restrictive definition), the traditional EJ block groups also decrease, from 204 (EJTrad) to 76 (EJTrad2X).

	(5a) EJAlt	(4a) EJTrad	(5b) EJAlt2X	(4b) EJTrad2X
Number of EJ Block Groups	336	204	135	76
Total SJTPO Block Groups	402	402	402	402
<i>Percent of Total</i>	83.6%	50.7%	33.6%	18.9%
TIP Projects in EJ Block Groups	17	13	11	6
Total SJTPO TIP Projects	21	21	21	21
<i>Percent of Total</i>	80.9%	61.9%	52.4%	28.6%
TIP Funding in EJ Block Groups (\$ Millions)	581.91	384.70	539.35	46.99
Total SJTPO TIP Funding (\$ Millions)	605.75	605.75	605.75	605.75
<i>Percent of Total</i>	96.1%	63.5%	89.0%	7.8%



Conversely, when you expand the definition from EJTrad to the less restrictive EJAlt, the number of projects increase from 13 (EJTrad) to 17 (EJAlt), and the TIP funding amount expands from \$384.70 million (EJTrad) to \$581.91 million (EJAlt). This comparison reveals that this less restrictive EJAlt definition expands the number of EJ areas, EJ area TIP projects, and EJ area TIP funding.

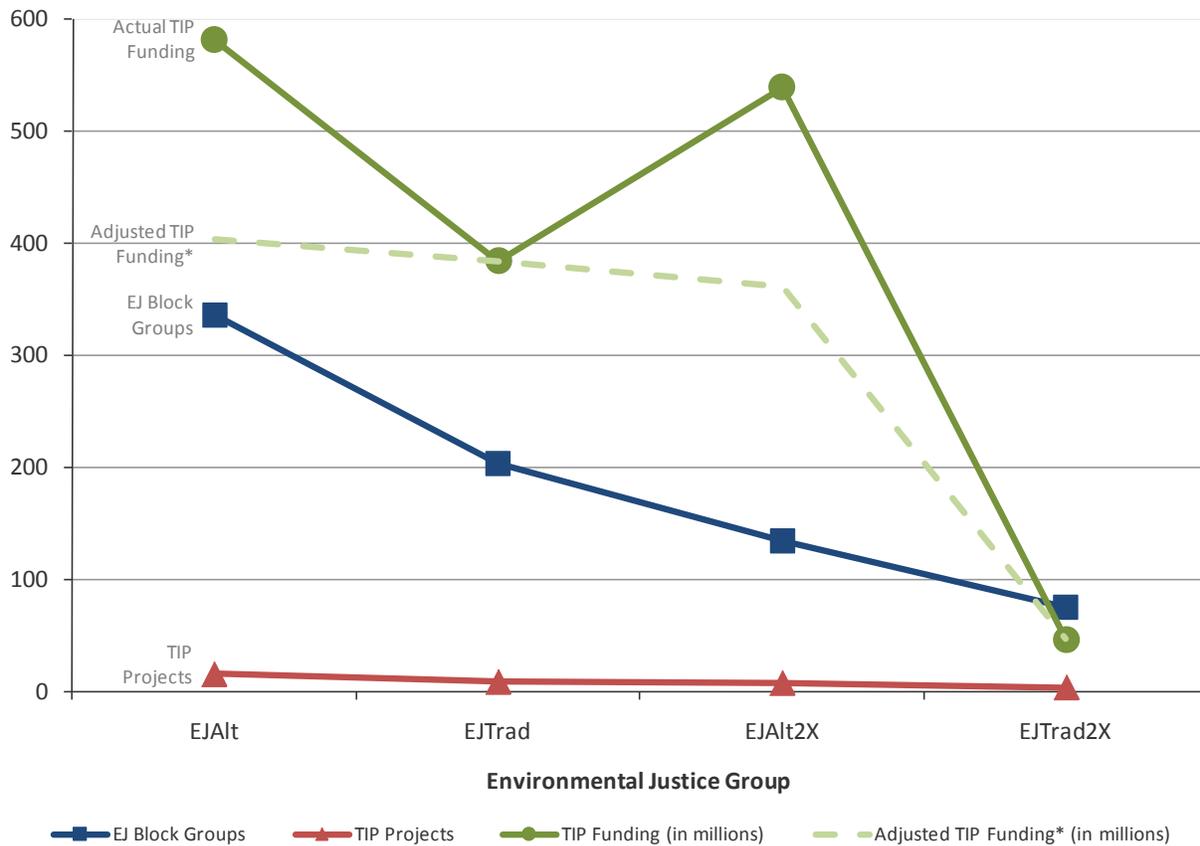
Table 7 – TIP Projects in All EJ Areas

#	TIP Project ID	Project Funding (\$ millions)	EJAlt	EJTrad	EJAlt2X	EJTrad2X
1	S0706	3.98	X	X	X	X
2	S0005	0.80				
3	98323	15.57	X	X	X	X
4	S0707	0.53	X	X	X	X
5	98543	136.24	X	X	X	
6	S0603	0.72	X	X		
7	S0704	1.85	X		X	
8	95043	12.37	X	X	X	
9	9351	9.16	X			
10	S0103A	2.78	X	X	X	X
11	96022	8.20	X			
12	1352	6.30				
13	95110	23.53	X	X	X	X
14	2149H	11.55	X	X		
15	242	15.00				
16	244A	178.00	X		X	
17	244	163.90	X	X	X	
18	S0009	9.80	X	X		
19	S0703	3.13	X	X		
20	S0702	0.60	X	X	X	X
21	S0705	1.74				
Total (\$ millions):		605.75	581.91	384.7	539.35	46.99
Percent of Total		100.0%	96.1%	63.5%	89.0%	7.8%

As the definitions for environmental justice become more restrictive, the relationship holds, a reasonable number of projects and funds are going to EJ populations as reflected in the proportion of TIP investment in EJ Areas. The information in Table 6 is further supported by Figure 1. Note in this Figure that the 1X threshold areas generate more TIP projects and have more block groups than 2X areas and that the Alternative EJ Areas also generate more TIP projects and have more block groups than Traditional EJ Areas. Projects in each EJ Threshold Areas are listed in Table 7, above. The TIP funding is more complex, with a similar pattern, however the 2X Alternative EJ Area (EJAlt2X) has more TIP funding than the 1X Traditional EJ



Areas (EJTrad). This is due to the Route 52 Causeway Replacement project, a portion of which, (Project ID 244A in Table 7) totaling \$178 million is included in EJAlt and EJAlt2X, but not EJTrad. With this project component removed the funding patterns become more consistent with patterns for the number of TIP projects and EJ block groups. The dashed line in Figure 1 reflects this Adjusted TIP funding, shown only for demonstrative purposes.



* Adjusted TIP Funding shown for demonstrative purposes only, to complement discussion in previous paragraph

Figure 1 – Comparison of Block Groups, TIP Projects, and TIP Funding in EJ Areas

It is important to reiterate that the primary measurement for environmental justice is against the Traditional EJ Areas (EJTrad), which are based on the official EJ class definitions within Federal regulations. However, to gain a better, and more specific understanding of the equity issues in the Region, this analysis looked at EJTrad, as well as Expanded Alternate EJ Areas (EJAlt), furthermore, both of these Areas are viewed at double their thresholds (EJTrad2X) and (EJAlt2X), this gives a picture of the highest concentrations of EJ populations in the region. Against all of these measures, SJTPO TIP funds and projects are distributed equitably.



Regional Transportation Plan (RTP)

SJTPO fully recognizes the importance of identifying and addressing issues related to environmental justice and Title VI of the 1964 Civil Rights Act in the formulation of its policies and plans. The Regional Transportation Plan (RTP) contains an overview of environmental justice issues and identifies the location of particular communities of concern (low-income, minority, and elderly populations). The RTP also states that it is a goal of the organization to promote linkages between low-income households and employment opportunities; the SJTPO has conducted Job Access and Reverse Commute planning initiatives to further the accomplishment of this goal. These efforts, along with other key plans, projects, and policies are summarized below, with excerpts highlighting environmental justice-related policies and recommendations.

The Regional Transportation Plan (RTP) serves as the official plan for the SJTPO region and guides the transportation decision-making for a projected twenty-five year horizon. It is updated periodically and was recently updated to plan for the years through 2035. The primary goals of the updated RTP are to:

- Promote transportation choices for the movement of people and goods
- Support the regional economy
- Improve transportation safety
- Improve security
- Mitigate traffic congestion
- Protect and enhance the environment
- Enhance the integration and connectivity of the transportation system
- Restore, preserve, and maintain the existing transportation system

While pursuing all of these goals are as important to low-income and minority populations as any other population of the SJTPO region, the goal “to promote transportation choices for the movement of people and goods” is particularly relevant to the organization’s recognition of the need to address access and quality of life for low-income, minority, and other disadvantaged populations. The policies supporting this goal include:

- Expand and improve non-auto transportation systems as needed: aviation, passenger rail, marine, rail freight, bicycle, pedestrian, and public transit.
- Provide for affordable mobility options to all segments of the transportation disadvantaged and support welfare-to work transportation initiatives.
- Support transit operating subsidies to ensure affordable mobility options.

Public involvement was an essential component of developing the 2035 RTP. The RTP Public Involvement Program was instituted to ensure early and timely input from a wide range of participants, particularly at critical milestones in the plan development process. The program included a Citizens Advisory Committee (CAC) workshop, a CAC/TAC questionnaire, focus



groups, public and agency meetings, and outreach through newsletters and the [SJTO website](#). For future updates and [RTP](#) development, the SJTO has developed the [RTP Public Involvement Program](#), which will enable them to more effectively reach low-income and minority populations and includes these populations in the planning process.

Public Involvement

The SJTO has a [Public Involvement Plan \(PIP\)](#), revised in 2009, which guides all SJTO public involvement efforts. The intent of the [PIP](#) is to insure that the SJTO has a provocative and meaningful public involvement process that provides complete information, timely public notice, full public access to all segments of the population to key decisions, and supports early and continuing involvement of the public in developing the [RTP](#) and [TIP](#).

The [PIP](#) also responds to the inherent need of the organization to develop public understanding and support of its activities. To accomplish this, the SJTO maintains procedures encompassing the following major goals:

- Increase and improve opportunities for public involvement.
- Increase the accessibility and transparency of information available to the public.
- Increase the efficiency of the public involvement process.
- Provide the public with more options and more education on how to get involved and be heard in the transportation planning process.
- Make better transportation decisions that meet the needs of all people.
- Enhance the environmental justice process.

In addition to the [PIP](#), the SJTO developed the [RTP Public Involvement Program](#), which focuses specifically on the [RTP](#). The basic objectives of the program are to inform and educate citizens about the [RTP](#), describe how citizens may provide input to assist with plan development, solicit and document local input, and to foster better public relations. To meet these objectives, the program emphasizes information exchange and online outreach, to compensate for the inherent difficulty in holding meetings and workshops for the general public in a region with low overall population density that is not well served by transit. The [RTP Public Involvement Program](#) also includes innovative outreach approaches, such as visits to local advocacy groups, and identification of key interest groups throughout the region, to be targeted for inclusion in the SJTO's planning processes.

The [RTP Public Involvement Program](#) also addresses public involvement as it relates to environmental justice. It includes a discussion of environmental justice and populations considered under the DOT order, identifies barriers specific to reaching environmental justice populations, along with strategies to overcome them, and recommends public involvement activities that will enhance outreach efforts to disadvantaged populations.



Area-Wide Job Access and Reverse Commute Transportation Plan (JARC)

In 2002, the SJTPO completed an update to the area-wide Job Access and Reverse Commute (JARC) Transportation Plan. The plan was developed for two primary reasons. First, while counties develop individual job access plans, referred to as Community Transportation Plans, the SJTPO recognizes that job access is truly a regional issue (with job opportunities dispersed throughout a regional labor market from Atlantic City to Wilmington, Delaware). The area-wide plan integrates the four county plans, creating a regional plan, and provides a forum for the counties to develop transportation services that provide access to the regional labor market. Secondly, the area-wide plan enables the counties to seek funding from the Federal Transit Administration's Job Access and Reverse Commute Program, which has helped fund projects in Atlantic and Cape May counties.

Currently, the SJTPO is beginning to update the area-wide Job Access and Reverse Commute (JARC) Transportation Plan. The purpose of the update is to support and incorporate the recent updates in the County JARC Plans, or Community Transportation Plans, completed in 2008. The update will include a summary of the geographic distribution of people, jobs, and transit service gaps, along with various strategies to address these gaps.

Unified Planning Work Program

Each year, the SJTPO, in cooperation with member agencies, prepares a Unified Planning Work Program (UPWP). The UPWP essentially serves as the master regional transportation planning funding application, emphasizing documentation of planning activities to be performed with funds provided to the SJTPO by the FHWA and FTA. It includes the work of member agencies and consultants, as well as the work done directly by the SJTPO staff. Public involvement is important to the development of the UPWP. From the outset, citizens are given an opportunity to suggest projects and other activities for consideration and the SJTPO staff solicits comments from the CAC.

Over \$2.27 million was programmed for use in the FY 2010 UPWP. Of these funds, over \$917,000 was programmed to support activities of the SJTPO staff, \$300,500 (amount includes federal funds and local match) was programmed for county activities, and over \$984,470 was programmed for technical studies. While a majority of this funding is needed for mandatory planning activities, such as the RTP, and support to carry them out, such as staff salaries and equipment, a notable amount of money is available to conduct studies and fund projects. As there continues to be funding available through the UPWP to fund local studies and projects, it is critical for organizations and communities throughout the region to become familiar with the planning process and encourage the development of a work program responsive to the needs, concerns, and issues facing their communities.



Table 8 - Detailed Profile of Areas Over Regional EJ Thresholds

Block Groups At or Above Regional Threshold	Block Groups	Tot Pop	Tot HH	Racial Minority	% of Tot	Hispanic	% of Tot	Low-Income	% of Tot	LEP	% of Tot	Elderly	% of Tot	Zero-Vehicle	% of Tot
All Traditional EJ Areas (EJTrad - Minority & Low-Income)	204	273,943	106,547	123,877	45.2%	51,588	18.8%	30,764	28.9%	24,885	23.4%	41,247	15.1%	22,498	21.1%
All Areas Outside Traditional EJ Areas (EJTrad)	198	271,012	104,030	26,719	9.9%	12,840	4.7%	14,055	13.5%	12,545	12.1%	42,269	15.6%	5,350	5.1%
Racial Minority	137	200,033	73,997	116,572	58.3%	47,214	23.6%	21,580	29.2%	20,747	28.0%	24,810	12.4%	18,337	24.8%
Hispanic Minority	120	170,353	62,846	88,369	51.9%	48,407	28.4%	17,528	27.9%	20,036	31.9%	21,810	12.8%	14,202	22.6%
Low-Income	168	211,281	84,524	89,721	42.5%	41,739	19.8%	27,744	32.8%	19,669	23.3%	34,848	16.5%	19,841	23.5%
All Extended EJ Areas	336	438,814	172,813	142,255	32.4%	61,107	13.9%	40,736	23.6%	33,754	19.5%	72,131	16.4%	26,606	15.4%
All Non-Extended EJ Areas	66	106,141	37,764	8,341	7.9%	3,321	3.1%	4,083	10.8%	3,676	9.7%	11,385	10.7%	1,242	3.3%
LEP	146	217,204	80,583	90,517	41.7%	48,882	22.5%	19,914	24.7%	24,824	30.8%	28,616	13.2%	15,769	19.6%
Elderly	181	212,259	90,973	39,950	18.8%	17,593	8.3%	20,841	22.9%	13,095	14.4%	48,444	22.8%	11,931	13.1%
Zero Vehicle	133	176,254	68,875	92,087	52.2%	40,762	23.1%	22,367	32.5%	18,069	26.2%	27,803	15.8%	20,025	29.1%
Total SJTPO Region	402	544,955	210,577	150,596	27.6%	64,428	11.8%	44,819	21.3%	37,430	17.8%	83,516	15.3%	27,848	13.2%

Table 9 - Detailed Profile of Areas Twice Regional EJ Thresholds

Block Groups At or Above Twice Regional Threshold	Block Groups	Tot Pop	Tot HH	Racial Minority	% of Tot	Hispanic	% of Tot	Low-Income	% of Tot	LEP	% of Tot	Elderly	% of Tot	Zero-Vehicle	% of Tot
All Traditional EJ Areas (EJTrad2X - Minority & Low-Income)	76	101,226	37,242	79,172	78.2%	30,318	30.0%	13,651	36.7%	11,724	31.5%	12,527	12.4%	13,216	35.5%
All Areas Outside Traditional EJ Areas (EJTrad2X)	71	95,780	34,840	76,964	80.4%	29,487	30.8%	12,491	35.9%	11,184	32.1%	11,455	12.0%	12,401	35.6%
Racial Minority	71	95,780	34,840	76,964	80.4%	29,487	30.8%	12,491	35.9%	11,184	32.1%	11,455	12.0%	12,401	35.6%
Hispanic Minority	57	76,521	26,815	50,179	65.6%	32,572	42.6%	8,382	31.3%	11,627	43.4%	9,321	12.2%	7,879	29.4%
Low-Income	26	33,100	13,972	27,338	82.6%	7,605	23.0%	7,577	54.2%	3,434	24.6%	5,088	15.4%	6,744	48.3%
All Extended EJ Areas	135	165,885	63,976	95,031	57.3%	41,619	25.1%	20,055	31.3%	17,422	27.2%	28,115	16.9%	17,659	27.6%
All Non-Extended EJ Areas	267	379,070	146,601	55,565	14.7%	22,809	6.0%	24,764	16.9%	20,008	13.6%	55,401	14.6%	10,189	7.0%
LEP	32	48,253	16,778	28,062	58.2%	22,657	47.0%	5,211	31.1%	9,047	53.9%	5,472	11.3%	5,571	33.2%
Elderly	34	29,699	14,141	4,817	16.2%	1,286	4.3%	3,460	24.5%	1,627	11.5%	11,140	37.5%	2,214	15.7%
Zero Vehicle	58	79,410	31,085	54,490	68.6%	21,136	26.6%	12,532	40.3%	9,662	31.1%	11,016	13.9%	13,174	42.4%
Total SJTPO Region	402	544,955	210,577	150,596	27.6%	64,428	11.8%	44,819	21.3%	37,430	17.8%	83,516	15.3%	27,848	13.2%

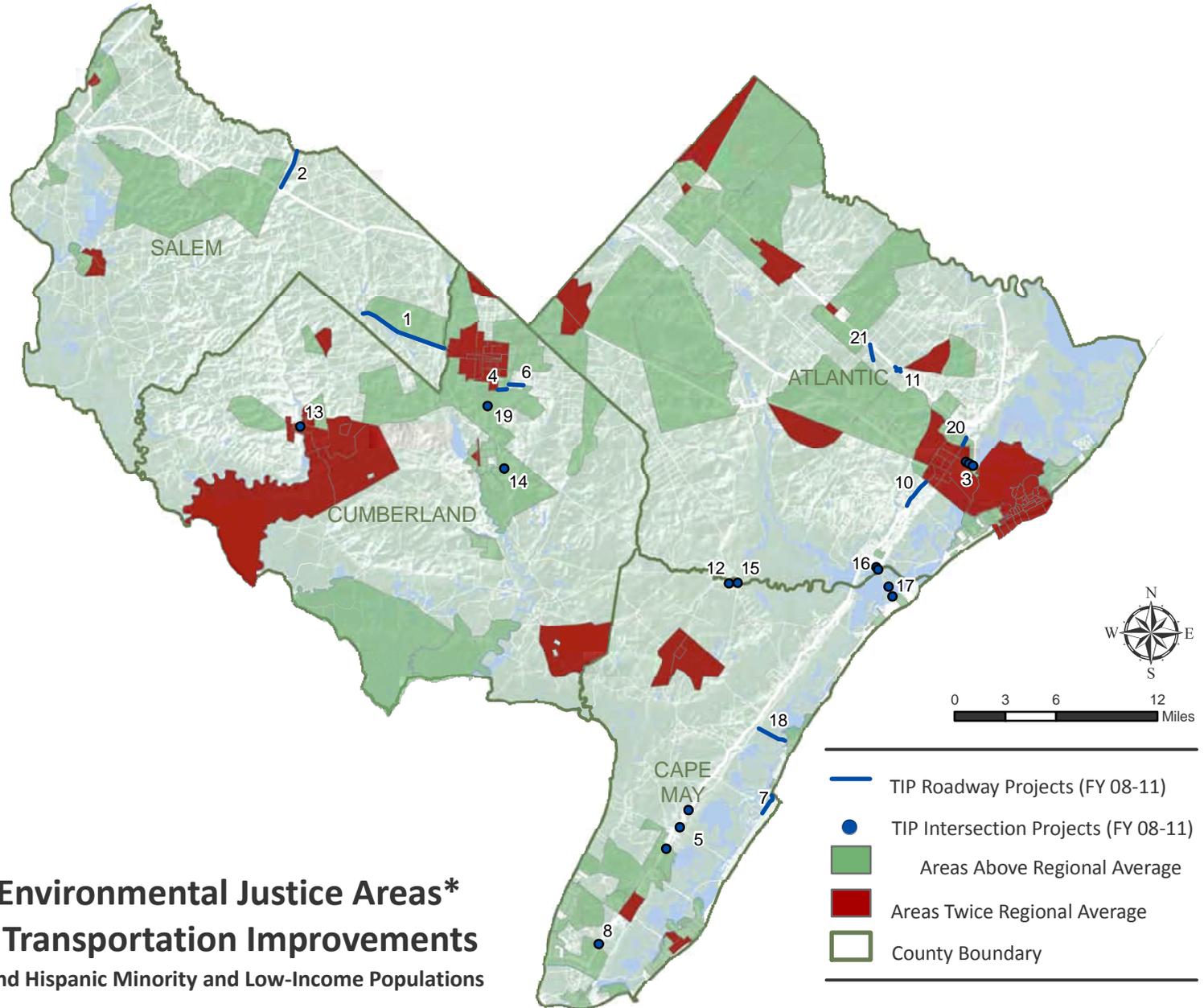


Figure 2:
Traditional Environmental Justice Areas*
And Future Transportation Improvements
* Includes Racial and Hispanic Minority and Low-Income Populations

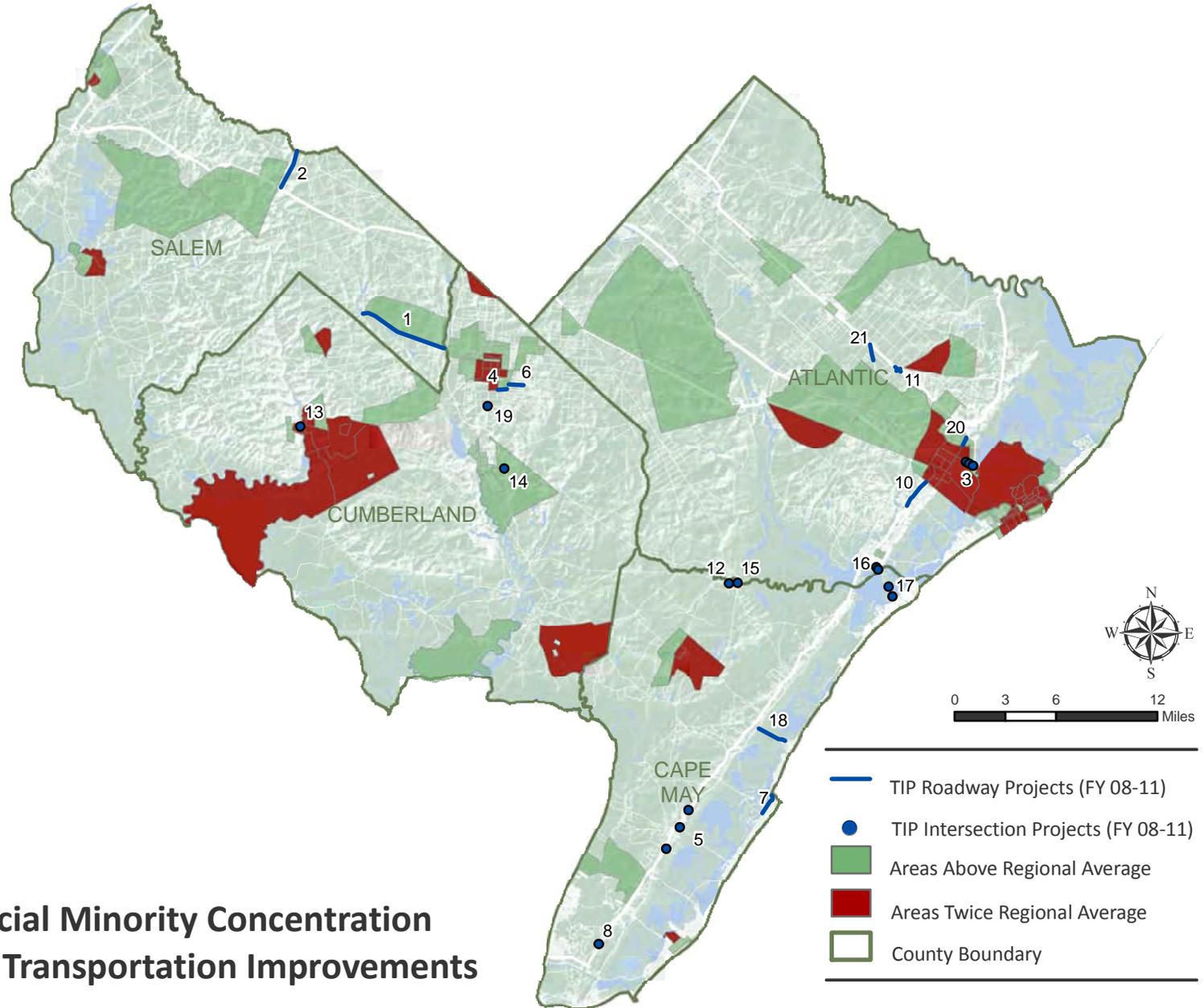


Figure 3:
Areas of Racial Minority Concentration
And Future Transportation Improvements

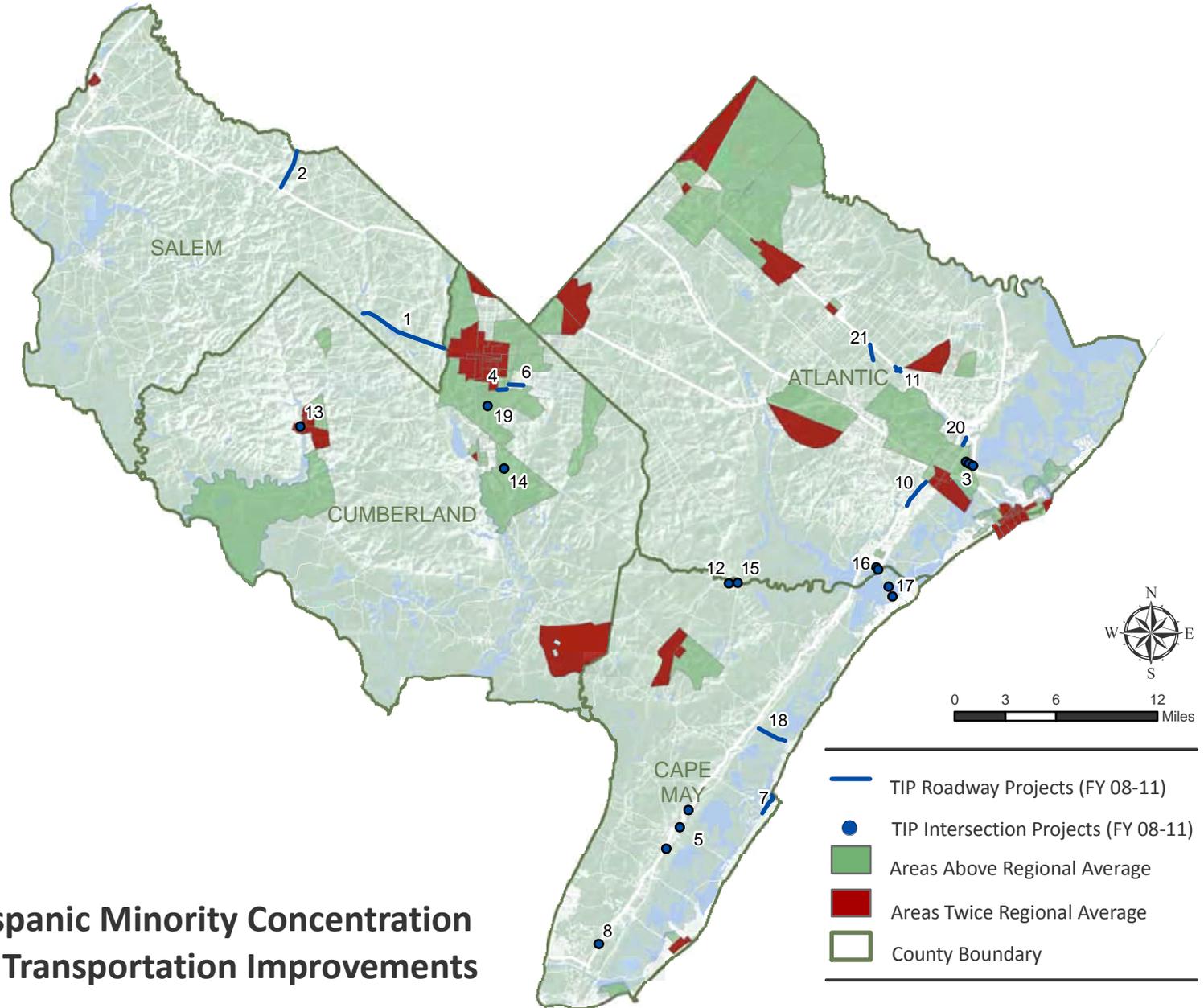


Figure 4:
Areas of Hispanic Minority Concentration
And Future Transportation Improvements

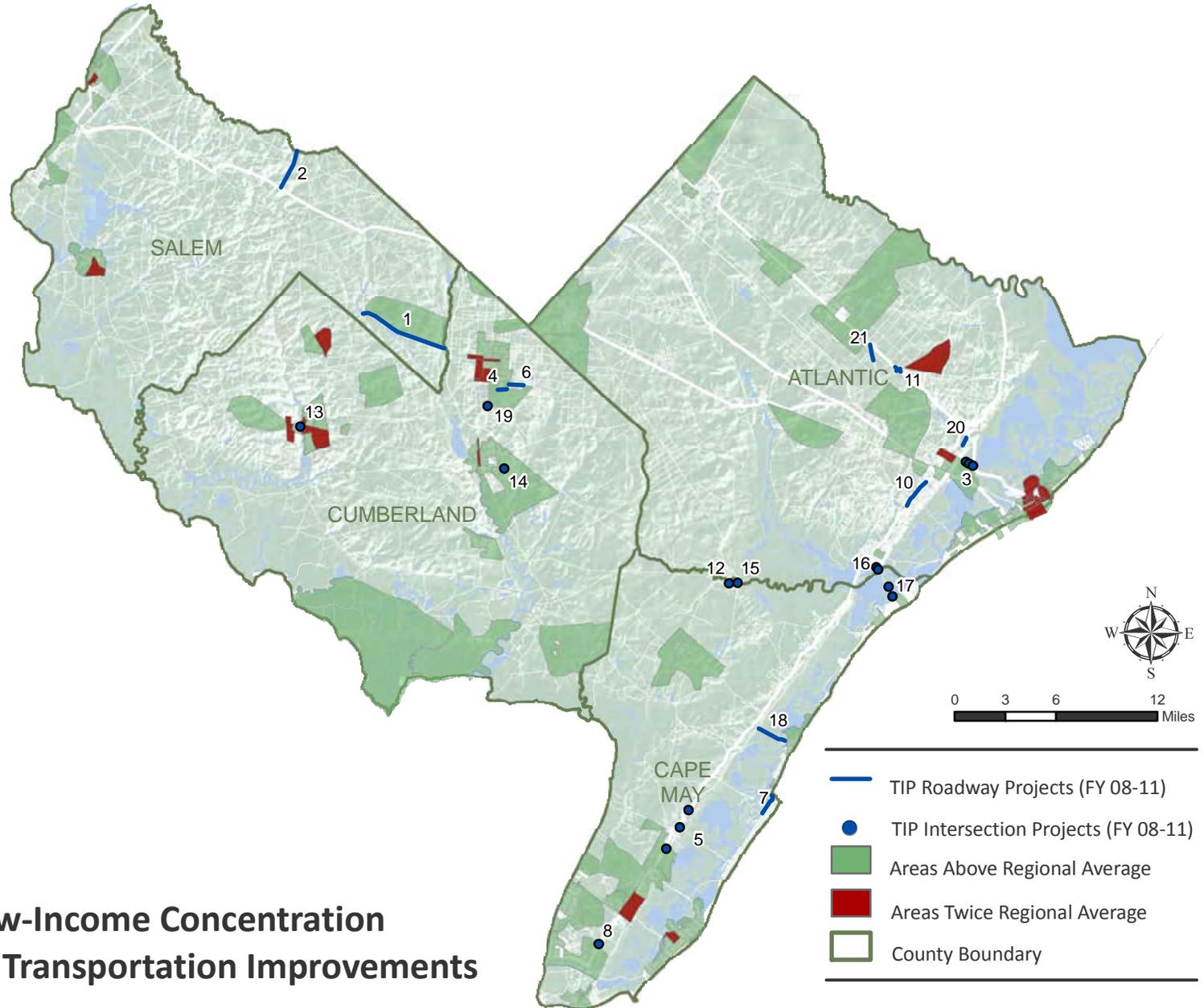
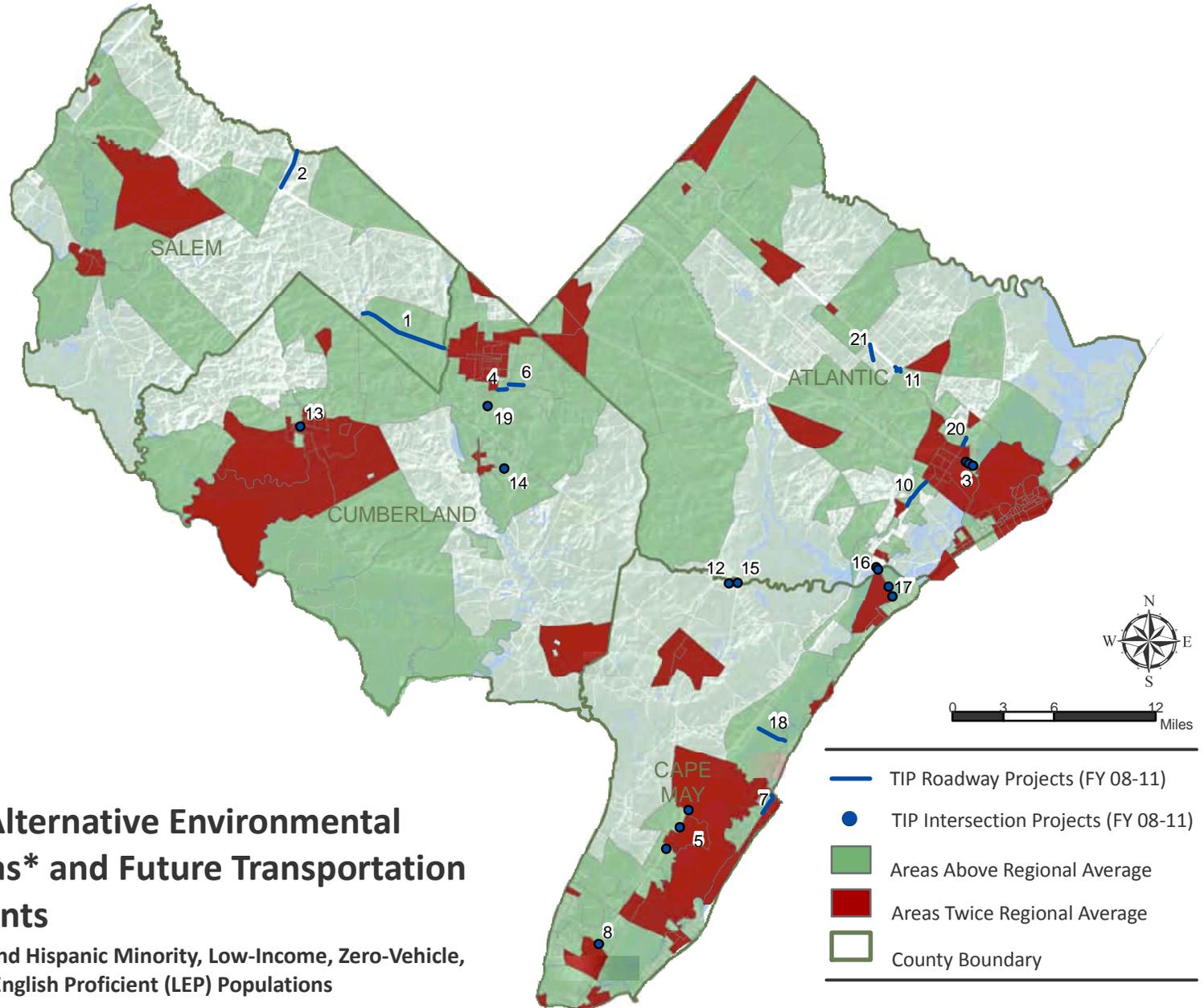


Figure 5:
Areas of Low-Income Concentration
And Future Transportation Improvements



**Figure 6:
Expanded Alternative Environmental
Justice Areas* and Future Transportation
Improvements**

* Includes Racial and Hispanic Minority, Low-Income, Zero-Vehicle, Elderly, Limited-English Proficient (LEP) Populations