

Environmental Justice (EJ) and Limited English Proficiency (LEP) Analysis for the East Coast Greenway Gap Routing Study

Month Day, 2021

The Capitol Region Council of Governments (CRCOG) is committed to ensuring the accessibility of its transportation planning program, especially to low-income, minority, and limited English proficiency communities that are traditionally underrepresented in the public outreach process. Neighborhoods with concentrations of minorities and/or low-income persons are considered Environmental Justice (EJ) target areas, and areas with significant numbers of persons who speak English less than very well (or not at all) are considered Limited English Proficiency (LEP) target areas. CRCOG uses various strategies, as identified in its Public Participation Plan, to outreach to these communities, and specific efforts are determined at the onset of special studies or projects.

The following analysis identifies EJ and LEP populations within the study area of the upcoming East Coast Greenway Gap Routing Study and recommends strategies for engaging with these populations during the study. Upon commencement of the study, a working or technical advisory group will be formed. The results of this analysis will be presented to the group at their first meeting, date to be determined. Following concurrence by the working group, CRCOG staff will ensure that the recommendations are reflected in the study's Public Involvement Plan.

Study Area & Purpose

In Connecticut alone there are 200 miles of the East Coast Greenway (ECG) and more than one third of them traverse through the Capitol Region (74 miles). The study area includes the three municipalities where the major remaining off-road gaps for the East Coast Greenway exist – the City of Hartford and the Towns of Bloomfield and East Hartford. While conceptual routes exist for each of these municipalities, no definitive route has been identified and therefore the default study area for the purposes of this analysis is to include each municipality in their entirety.

To date, efforts to reach a consensus for finalized routes have failed due to limited rights-of-way, desire for off-road segments versus urban environments, property ownership considerations, and environmental sensitivities. Despite these challenges, among the 13 communities in the CRCOG region that the ECG runs through, Bloomfield, Hartford, and East Hartford are consistently the communities most in need of and positioned to benefit from connections to the ECG and all it has to offer. Closing these gaps in the ECG will improve the health, safety, and quality of life not just for the region but specifically for the residents of these communities.

This study is necessary to identify one constructible preferred alignment and associated infrastructure needs necessary to close all the remaining routing gap uncertainties in the Capitol Region.

Environmental Justice Considerations

CRCOG adopted its Public Participation Plan in 2017. This plan calls for tailored outreach efforts to be taken to ensure involvement of minority and low-income populations in special studies such as the East Coast Greenway Gap Routing Study. Per CRCOG's policies, when the impact area of a study includes concentrations of EJ populations, special consideration in public outreach efforts should be given. In determining whether such special considerations may be necessary, a determination first must be made as to whether or not EJ target areas are located within the study area. This is done by overlaying the study area on CRCOG's EJ maps. Then, if appropriate, special public outreach efforts are designed based on those findings.

Environmental Justice target areas were adopted by the Capitol Region Environmental Justice Advisory Board and subsequently by the CRCOG Policy Board in 2003. The target areas are defined as follows:

Andover / Avon / Berlin / Bloomfield / Bolton / Canton / Columbia / Coventry / East Granby / East Hartford / East Windsor / Ellington / Enfield / Farmington / Glastonbury / Granby / Hartford / Hebron / Manchester / Mansfield / Marlborough / New Britain / Newington / Plainville / Rocky Hill / Simsbury / Somers / South Windsor / Southington / Stafford / Suffield / Tolland / Vernon / West Hartford / Wethersfield / Willington / Windsor / Windsor Locks

A voluntary Council of Governments formed to initiate and implement regional programs of benefit to the towns and the region

Commented [CP1]: Probably don't need this paragraph?... also fine to keep though?

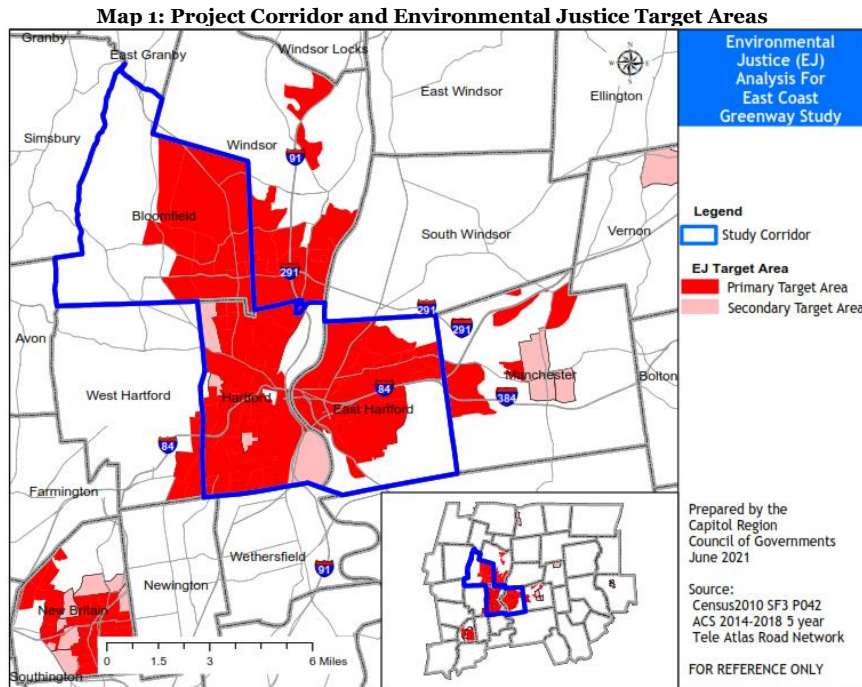
Commented [TM2R1]: @Caitlin Palmer, I'd probably get rid of it. No need to include it here.

- *Primary EJ Target Area:* The primary EJ target area includes any census block group that has at least 50% minority population, according to the current Census. For this analysis, data from the 2010 Census was used.
- *Secondary EJ Target Area:* The secondary EJ target area includes any census tract with at least 20% of its population with an income at or below 150% of the poverty threshold, according to the current Census.¹ For this analysis, data from ACS 2014-18 estimate was used.

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Environmental Justice Findings

Map 1 shows the primary and secondary EJ target areas within and surrounding the study area for the East Coast Greenway Gap Routing Study. Most of the study area is composed of both primary and secondary target areas, however, in areas where both target areas occur, only the primary target area is shown on the map.



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Limited English Proficiency Considerations

A policy entitled Reducing Language Barriers was approved by the CRCOG Policy Board in 2005 and is included by reference in CRCOG’s Public Participation Plan. This policy contains guidelines for making

¹ The secondary EJ target area was originally defined as any census block group that has at least 20% of its population with an income at or below 150% of the Census poverty threshold based on the latest census data. Due to changes in Census Bureau methodology, the census tract is now the smallest geography for which estimates are readily and consistently available. CRCOG, therefore, has shifted to utilizing census tract level data for this analysis.

CRCOG transportation programs more accessible to LEP individuals, who are defined as those who speak English “less than very well.” In 2019, CRCOG developed a Language Assistance Plan to further identify needs and opportunities related to outreach to LEP populations within the Region.

LEP Target Areas: CRCOG’s LEP policy and target areas are defined² as follows:

- *Primary LEP Target Area:* The primary target area includes census tracts where the LEP population of a given language accounts for more than 20% of the census tract population.
- *Secondary LEP Target Area:* The secondary target area includes census tracts where the LEP population of a given language accounts for 5-20% of the census tract population.

Limited English Proficiency Findings

Table 1 shows the largest LEP populations that were identified within the study area. Spanish and Portuguese meet USDOT’s Safe Harbor threshold of 5% of an area or at least 1,000 individuals. As such, the remainder of the analysis focuses on Spanish and Portuguese language LEP target areas within the study area. However, should LEP individuals of other languages request accommodation during the study, CRCOG will ensure that these individuals are not denied access to participation.

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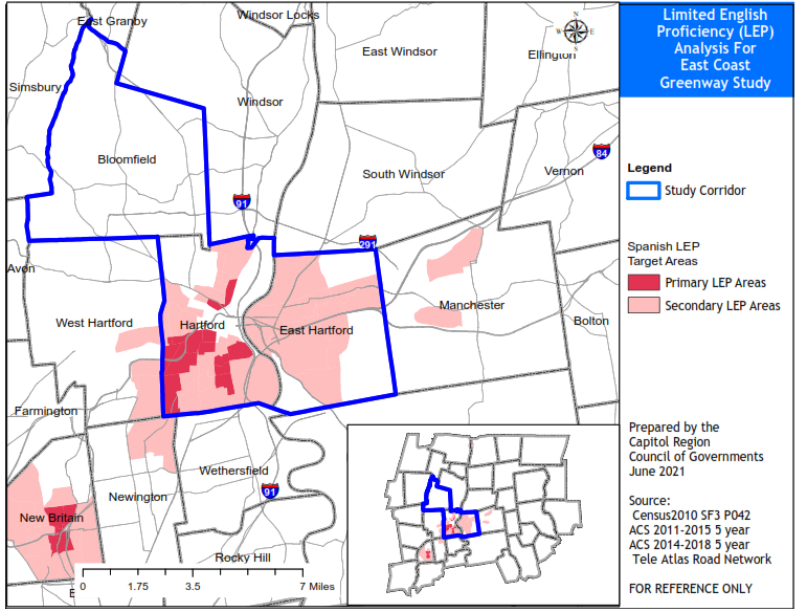
Table 1: Largest Study Area LEP Populations

LEP Language	Population	% of Study Area Population (183,950)
Spanish	22,569	12.2%
Portuguese	1,119	0.6%
French	503	0.3%
Serbo-Croatian	521	0.3%

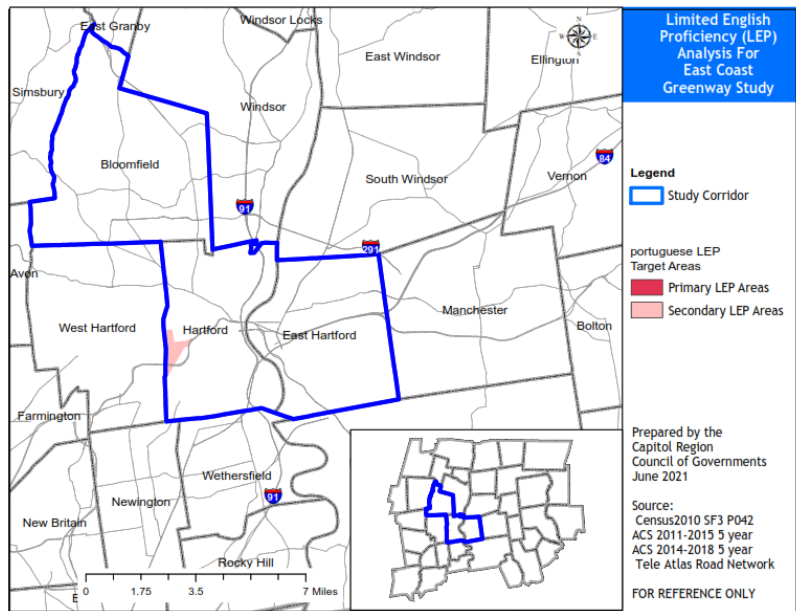
Maps 2 and 3 show the Spanish and Portuguese Language LEP target areas within the study area for the ECG Study. There are Spanish and Portuguese language LEP target areas within the study area of the three municipalities.

² CRCOG’s Limited English Proficiency policy and target areas were originally defined based on census block group level data. Due to changes in Census Bureau methodology, the census tract is now the smallest geography for which estimates are readily and consistently available from the American Community Survey (ACS). CRCOG, therefore, has shifted to utilizing census tract level data for this analysis.

Map 2: Project Corridor and Spanish Limited English Proficiency Target Areas



Map 3: Project Corridor and Portuguese Limited English Proficiency Target Areas



Summary and Recommendations

The study area for the ECG Study includes primary and secondary target areas for both EJ as well as Spanish and Portuguese LEP populations. As such, outreach efforts for the Study should be developed in a way that encourages engagement with these populations.

Potential outreach efforts could include:

- Outreach to established neighborhood groups within the study area;
- Outreach at bus stops;
- Flyers/signage onboard buses;
- Online engagement portals that are available on a 24/7 basis for several days to allow individuals to engage at times that are convenient to them;
- Presentations at regularly scheduled meetings of community groups, church groups, etc.;
- Neighborhood representation on the study's working group; and/or
- Use of small, informal meetings, focus groups, or pop-up events to reach individuals who might not be inclined to attend large formal meetings.

Potential language translation and accommodations could include:

- Spanish and Portuguese language translation of study website, flyers, and surveys;
- Spanish language interpreters at public outreach events;
- Translations of the study's Executive Summary into Spanish and Portuguese, if needed; and/or
- Consultation with the City of Hartford stakeholders regarding further language translation needs for Portuguese populations but at minimum language assistance notice for Portuguese speakers on all printed or digital media.