

Environmental Justice (EJ) and Limited English Proficiency (LEP) Analysis for the Transit Oriented Development (TOD) 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 TOD Study and recommends strategies for engaging with these populations during the study. This information will be presented to the study's Project Advisory Committee at its first meeting on December 15, 2021. Following concurrence by the Project Advisory Committee, CRCOG staff will ensure that the recommendations are reflected in the study's Public Involvement Plan.

STUDY AREA AND PURPOSE

The study area includes a half-mile buffer around existing and proposed stations along the CT Fastrak and CTrail Hartford Line within the Capitol Region. There are 15 such areas within the study area, some of which overlap with each other. The purpose of this study is to build on previous studies and help municipalities identify and advance site-specific TOD visions and analyze their financial feasibility. This study's vision is to create a market-bearing TOD plan for each community that will draw developer interest and investment in the property.

ENVIRONMENTAL JUSTICE CONSIDERATIONS

CRCOG adopted its Public Participation Plan in 2017. This plan calls for special outreach efforts to be taken to ensure involvement of minority and low-income populations in special studies such as the TOD 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:

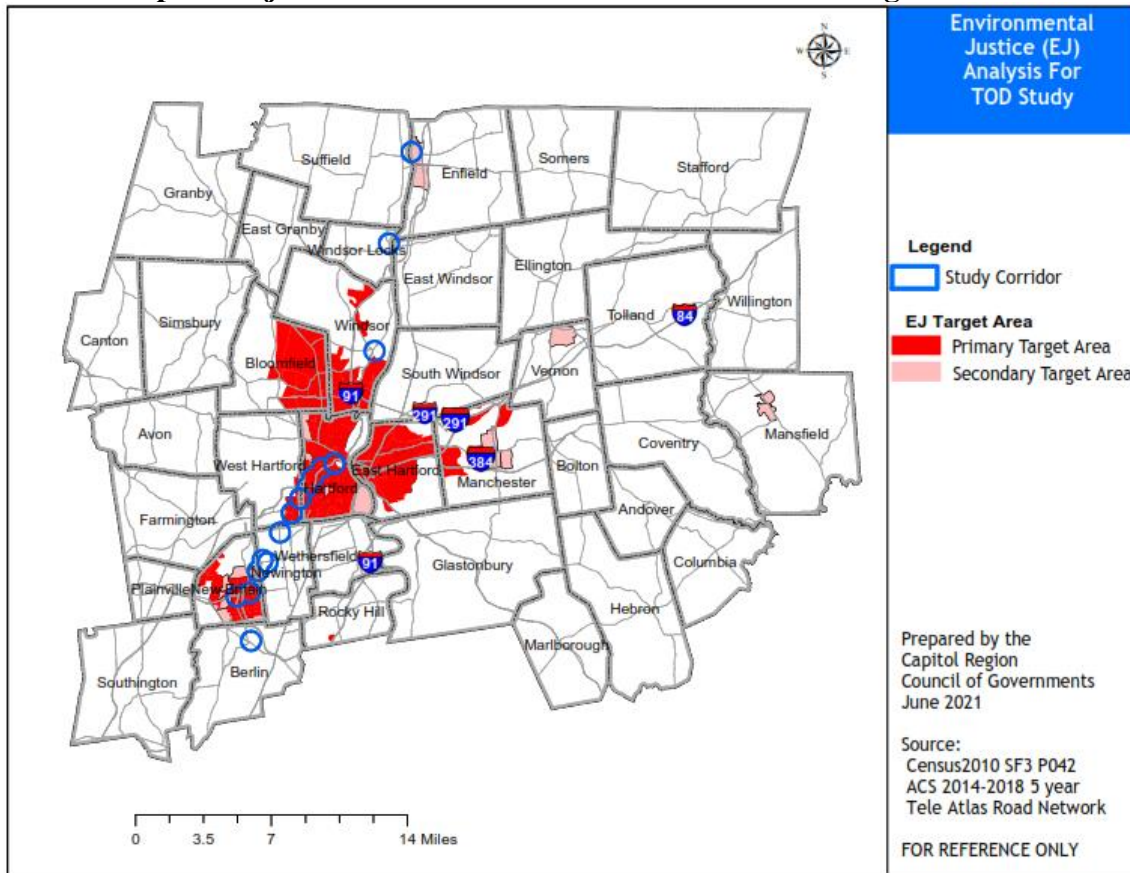
Primary EJ Target Area: The primary EJ target area includes any census block group that has at least 50% minority population, according to the current Census. For this analysis, data from the 2010 Census was used.

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.

ENVIRONMENTAL JUSTICE FINDINGS

Map 1 shows the primary and secondary EJ target areas within and surrounding the study area for the TOD 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.

Map 1: Project Corridor and Environmental Justice Target Areas



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 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.

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 the 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.

LEP Target Areas: CRCOG’s LEP policy and target areas were originally defined based on census block group level data. Due to the changes in Census Bureau methodology, the census tract is the smallest geography for which estimates are readily and consistently available from the American Community Survey (ACS). As such, this analysis is based on tract level data. The target areas are defined 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.

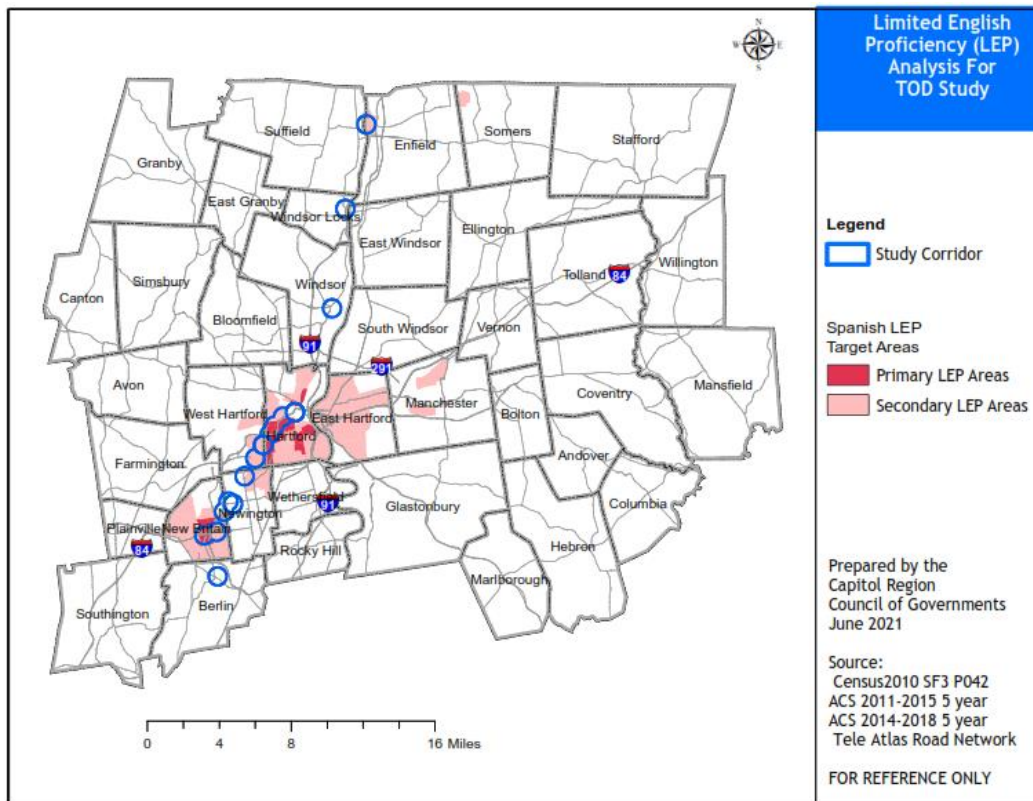
LIMITED ENGLISH PROFICIENCY FINDINGS

Table 1 shows the largest LEP populations that were identified within the study area. Only Spanish, Polish, 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 those 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.

Table 1: Largest Study Area LEP Populations

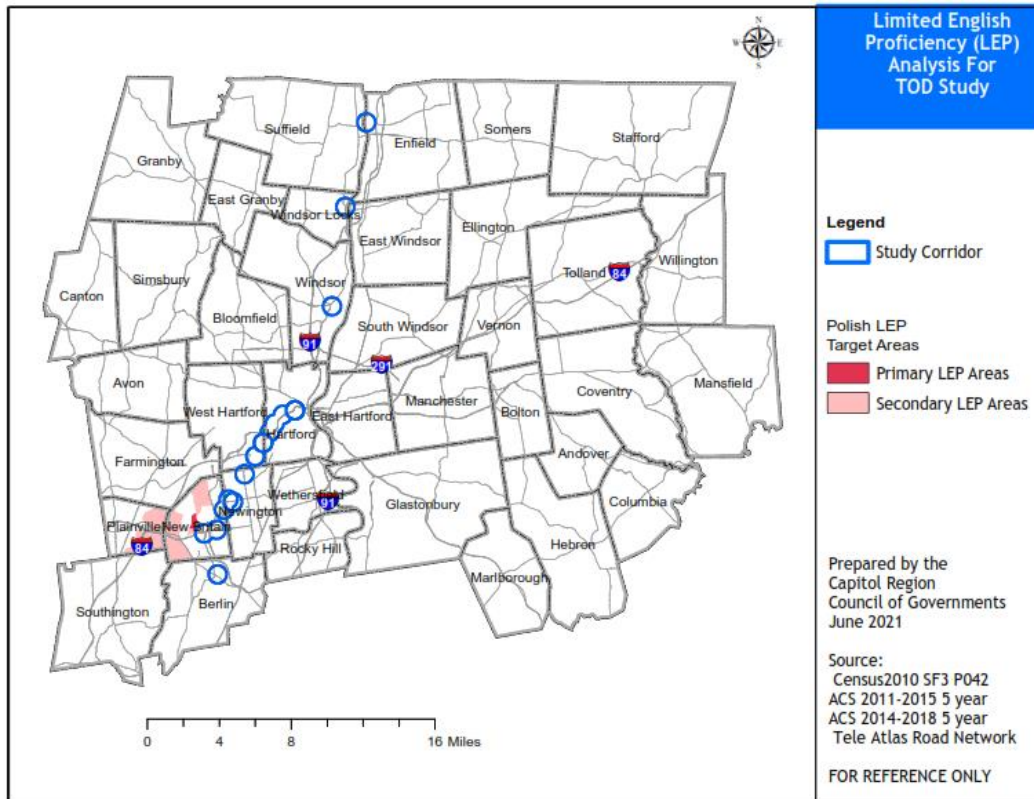
LEP Language	Population	% of Study Area Population (165,383)
Spanish	15,996	9.7%
Polish	2,761	1.7%
Portuguese	1,477	0.9%
Hindi	519	0.3%
Italian	511	0.3%

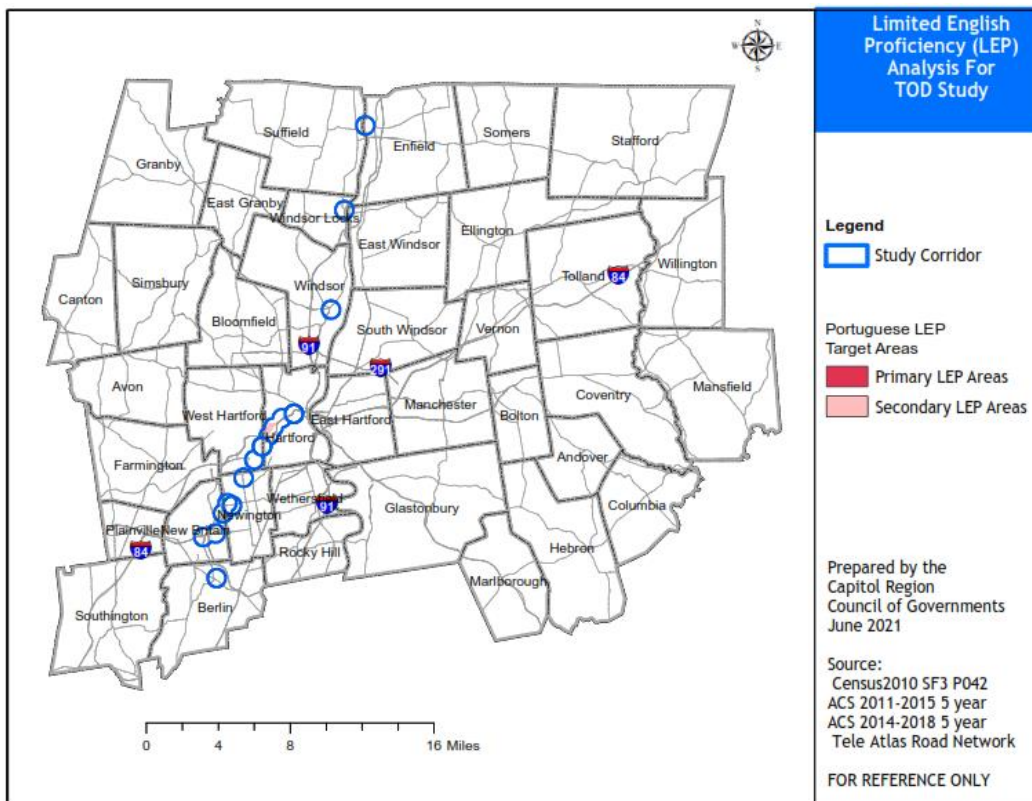
Maps 2, 3 and 4 show the Spanish, Polish, Portuguese Language LEP target areas within and surrounding the study area for the TOD Study. There are Spanish and Polish language LEP target areas within the study corridor. There is also a small Portuguese Language LEP target area in the City of Hartford.



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

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



Map 4: Project Corridor and Portuguese Limited English Proficiency Target Areas

SUMMARY AND RECOMMENDATIONS

The study area for the TOD Study includes primary and secondary target areas for both EJ and Spanish, Polish 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 Technical Advisory Committee; and/or
- Use of small, informal meetings or focus groups to reach individuals who might not be inclined to attend large formal meetings.

Potential language translation and accommodations could include:

- Spanish and Polish language translation of study website, flyers, and surveys;
- Inclusion of a language assistance notice on the study website, meeting agendas, and flyers in Spanish, Polish, and Portuguese;
- Spanish, Polish and Portuguese language interpreters at public outreach events; and/or

- Translations of the study's Executive Summary into Spanish, Polish and Portuguese.