ELEMENT 3

PROCESS FOR ENVIRONMENTAL JUSTICE ASSESSMENT

INTRODUCTION

To address the need for Environmental Justice, transportation investments must provide an equitable distribution of transportation benefits and should not result in a disproportionate burden of adverse impacts on Minority and Low Income population groups. To determine if its transportation planning process complies with Environmental Justice, OKI has developed an assessment process. This EJ assessment process provides for a comparison of the relative treatment of target and non-target populations in regard to transportation investments.

The EJ assessment process is conducted for the major outcomes of OKI’s transportation planning process, which are the long-range transportation plan and the short-range Transportation Improvement Program (TIP), and also for amendments to the long-range plan (the EJ assessment of an amendment to the TIP is performed when an amendment involving a capacity expansion project is incorporated into a plan amendment or plan update). OKI designed its EJ assessment process in response to federal policy and state guidance.

As described in this policy element, the EJ assessment process compares the impacts of plan and TIP recommendations on Minority and Low Income target areas with the rest of the region (target areas are defined in Policy Element 2). The impacts are calculated by OKI’s travel demand model for 28 measures, or indicators, of transportation mobility and accessibility. Additional information on OKI’s EJ assessment process is provided in the following:

- Appendix A provides additional detail on the measures used in OKI’s EJ assessment process
- Appendix B presents data developed through OKI’s EJ assessment process and used in the EJ assessment of OKI’s 2030 plan update
- Appendix C provides a summary of the EJ assessment conducted for OKI’s recent plan update

ENVIRONMENTAL JUSTICE ASSESSMENT POLICY

OKI’s EJ assessment process will use the agency’s travel demand model to produce data for comparing the relative treatment of target and non-target populations in the transportation planning process. The model will be used to quantify data representing transportation mobility and accessibility 1) by
different transportation scenarios, 2) for different population groups, and 3) for a variety of impact measures.

In transportation planning, the travel demand model is used to forecast travel patterns for different transportation scenarios and then calculate data for measuring the impacts of the different travel patterns, such as total vehicle-miles-of-travel (VMT) and pollutant emissions. These impact measures are analyzed as a basis for recommending a plan or TIP.

In the EJ assessment process, OKI will use the travel demand model to calculate data for additional measures as a basis for assessing the impact of transportation investments on EJ target and non-target areas. For assessing a long-range plan that includes a TIP, these EJ impact measures will be calculated for the following transportation scenarios:
1) The existing transportation system
2) The “existing plus committed” system (the existing system under future conditions modified only by project recommendations in the TIP)
3) The future transportation system as recommended in the long-range transportation plan

For an EJ assessment of the TIP, impact measures will be calculated for the first and second scenarios listed above. For an EJ assessment of an amendment to the long-range plan, impact measures will be calculated for the first and third of the scenarios above.

OKI will use EJ impact measures that can be subject to its model and that indicate transportation mobility and accessibility. Measures will be used from three categories: travel time, congested VMT, and job/service opportunity. Each of these categories will be further sub-divided to account for different travel modes (auto vs. transit) and/or travel time (peak travel time, which is associated with work trips; off-peak travel time, which is associated with trips for medical, educational, recreational, or other non-work purposes; and average daily travel time). These measures are further described below.

- **Travel Time:** The average number of minutes for different types of trips as differentiated by travel mode (auto vs. transit), time-of-day (peak, off-peak, or daily average), and trip purpose or destination (work, other/non-work, the Cincinnati central business district, and the nearest hospital, university, and regional shopping center)

- **Congested VMT:** The percentage of travel under congested conditions on a daily or peak-hour basis

- **Job/Service Opportunity:** The number of employed people or the percentage of population accessible to major trip destinations (hospitals,
universities, central business district, and regional shopping centers) within a
specified travel time differentiated by travel mode (20 minutes travel time by
auto, 40 minutes travel time by transit).

All together, OKI will develop data for 28 EJ impact measures under each
transportation scenario, as listed in Table 3-1. For each measure, data will be
calculated for “all population groups” and for the five EJ target areas and five
corresponding non-EJ areas (EJ target areas are defined in Policy Element 2).
Appendix A presents additional detail on the EJ impact measures, including a list
of the hospitals, shopping centers, and universities used in the analysis. This
detail is part of a larger document available at OKI entitled Impact Measures for
Environmental Justice Analysis (August 2001) for operating the model for the EJ
assessment process.

From the data developed in the EJ assessment process, the transportation
conditions for Minority and Low Income target areas will be compared with those
of non-target areas. For three other population groups (i.e., Elderly population,
People with Disabilities, and Zero-Car Households), OKI will define target areas
and develop data but is not required to conduct an EJ assessment. The
significance of the comparative process for these groups is reduced by the
relatively disbursted distribution of the Elderly population and People with
Disabilities, for which the target areas contain less than half the group
population, and by the strong correlation of the Zero-Car Household target area
to the Minority and Low Income target areas. An EJ assessment could be
conducted for any of these groups, however, at OKI’s discretion or in response to
interest by EJ organizations or the public or to address new regulations or policy.

Appendix B presents the data developed for the EJ assessment process in
conformity with OKI’s EJ Assessment Policy and for use in the EJ assessment of
OKI’s 2030 plan update, the OKI 2030 Regional Transportation Plan. The plan
update’s EJ assessment was conducted while OKI was developing an EJ
Assessment Policy but before the policy was finalized, as explained in Appendix
C. In the future, this EJ Assessment Policy will be the basis for the EJ
assessments conducted by OKI.