ELEMENT 4

PLAN IMPLEMENTATION

ADMINISTRATION OF PARTICIPATION PLAN

OKI is committed to this document’s implementation. This level of commitment is exemplified in several ways:

- Ensuring the proper conduct of the provisions in OKI’s Participation Plan
- Coordinating with EJ organizations and communities
- Monitoring OKI’s coordination with Title VI, ADA, LEP and Section 504
- Researching approaches used by other MPOs to address Participation
- Serving as OKI’s advocate for participation of EJ groups/areas
- Assessing the need for modifications to OKI’s Participation Plan
- Providing staff support to an OKI EJ Advisory Committee
- Consulting with local and state resource agencies to develop the best strategies for mitigating environmental impacts on a regional level
- Assessing the effectiveness and equity of the Participation Plan’s provisions for public participation.

Participation Plan Administrator

OKI has established a position for overseeing the implementation of the agency’s Participation Plan. This position involves responsibility for the bullets listed above. This position is currently filled by:

Florence J. Parker
OKI Regional Council of Governments
720 East Pete Rose Way, Suite 420
Cincinnati, OH 45202
T: 513-619-7686  F: 513-621-9325
fparker@oki.org

ENVIRONMENTAL JUSTICE ADVISORY COMMITTEE

OKI has an EJ Advisory Committee to:
- Provide oversight of the application of OKI’s Participation Plan
- Monitor the overall effectiveness of OKI’s Participation Plan and compliance with federal policy
- Ensure input on EJ regional planning needs and concerns in OKI’s decision-making process
- Participate in the TIP and Plan project prioritization process
TECHNICAL SUPPORT FOR PLAN IMPLEMENTATION

- OKI will develop and maintain an **EJ Network List** that will identify key agencies/organizations that serve Minority, Low Income, and Elderly populations, People with Disabilities or serve as their advocates, and Zero-Car Households. This list will include major churches and ministerial organizations. The list will provide indications of how agencies/organizations may be used for implementing OKI’s Participation Plan, including, but not limited to, their interest in providing coordination to OKI, acting as liaison with the community/clients/congregations, and/or disseminating information by newsletter or other means. The list will include names of contacts, phone numbers, and email addresses. OKI will also utilize various social media platforms to enhance information distribution and reach.

- A **List of Recommended Facilities** will be developed. The list will indicate facilities preferred as sites for meetings with or making information available to EJ Target Groups/Areas. Information will be provided on transit access, access for people with disabilities, size of meeting space, etc., as well as street address, community, name of contact person, and phone number. The list may include libraries, faith-based communities/congregations, schools, medical buildings, agencies, EJ organization facilities, and businesses serving EJ populations.

- A **Media List** of sources available for reaching EJ population groups will be developed. The list will include public newspapers, agency/organization newsletters (for communities, public agencies, private organizations, faith communities/congregations, schools), radio stations (including Radio Reading Service), and special events.

- OKI will develop a database on **EJ Target Areas** designed for public access. It will include, but not necessarily be limited to, base data and summary analysis of the Target Groups/Areas (see plan Element 2) and lists and/or maps of jurisdictions, communities, or neighborhoods in EJ Target Areas.

- As dictated by federal mandates and discrete scopes of work, OKI coordinates and consults with a number of public, private and non-profit agencies and organizations on regional or sub-regional transportation studies, plans and programs, including the 2040 OKI Regional Transportation Plan, the TIP, the Strategic Regional Policy Plan, and several corridor studies. This includes agencies that are responsible for land use management, natural resources, environmental protection, conservation and historic preservation.

- Through consultation with resource agencies, OKI works to develop the best strategies for mitigating environmental impacts on a regional level. To the extent possible, key environmental resource agency personnel are included on OKI committees.
Environmental resource agencies are also invited to review and comment on the Plan and other major documents. Coordination and consultation occur as necessary in formal and informal settings, on long- and short-term basis, and in individual contacts and group discussions.

The following are some of the agencies and organizations with which OKI has interacted in the past and will consult with in the future to enhance participation efforts:

- Federal and state transportation departments
- Federal and state environmental agencies
- Federal and state natural resources agencies
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- U.S. Department of Agriculture
- U.S. Environmental Protection Agency
- Federal Aviation Administration
- National Park Service
- Federal and state emergency management agencies
- Federal, state and local homeland security agencies
- State air quality agencies
  - Indiana Department of Environmental Management
  - Kentucky Natural Resource and Environmental Protection Cabinet
  - Ohio Environmental Protection Agency
- State historic preservation offices
- State departments of agriculture
- Public transit service providers
  - Butler County Regional Transit Authority
  - Clermont Transportation Connection
  - City of Middletown Transit System
  - Southwest Ohio Regional Transit Authority
  - Transit Authority for Northern Kentucky
  - Warren County Transit System
- Local elected officials
- Local government planning commissions
- Local government public works and engineering departments
- Local transportation improvement districts
- Local government environmental services departments
- Local government public safety departments
- Regional and local water and sewer districts or departments
- Soil and water conservation districts
- Resource conservation and development districts
- Flood control districts
- Local park districts
- Local recreation departments
- Local health departments
- Local watershed planning groups
- Local government economic development offices
- Local agencies for children, seniors and the disabled
- Local school districts, colleges and universities
- Local hospital associations
- Local business and community/neighborhood associations
- The United Way
- Trade and industry associations, such as chambers of commerce, the Hispanic Chamber of Commerce, Greater Cincinnati & Northern Kentucky African American Chamber of Commerce, Homebuilders associations, Realtors, and Farm Bureau Federation chapters
- Civic associations, such as the NAACP, the Urban League, the Sierra Club, the League of Women Voters, and Citizens for Civic Renewal

EVALUATION OF PARTICIPATION PLAN

OKI will conduct a four year review of the effectiveness of its participation process. OKI will develop evaluation forms (as indicated below) for use at public meetings. The forms may also be used for other participation efforts. The distribution, collection, review, and maintenance of the forms will be the responsibility of OKI staff responsible for administering the Participation Plan. The forms will be made available to the public for review on request.

- A Record of Participation will be completed by OKI staff. It will include, at a minimum, information on:
  - Meeting date, time, location, and topics
  - Methods for publicizing the meeting
  - Number of participants (excluding staff) by categories such as OKI committee member, elected official, agency staff, organization affiliate, unaffiliated citizens

- A Comment Sheet for Evaluation by Participants will be available at each public meeting. Participants will be encouraged to complete the Comment Sheet before leaving the meeting. It will include the meeting date, time, location, and topic. Participants will be asked for information that includes:
  - Participant’s comments on the information presented
  - Participant’s name, mailing address, telephone number, email address, neighborhood for residence and work, and interest in coming to the meeting (such as OKI committee member, elected official, agency staff, organization affiliate, community resident, community business, etc.). The Comment Sheet will note that the participant’s response to this question is optional.
  - How participant learned of the meeting (checkboxes)
- Indications of participant’s opinion of the suitability of meeting location, meeting time, topics presented, format of information presented, opportunity for comment, and overall event (checkboxes and space for comments)

Appendix: Environmental Justice Target Groups and Target Areas

Data from the U.S. Census Bureau’s decennial censuses and American Community Surveys (ACS) are the bases for determination of the Environmental Justice (EJ) Target Groups and Target Areas. Decennial census data, as the name implies, is gathered once each decade in years ending in zero from every household in the nation. Decennial census data is limited to a small selection of subject matter but is available for every level of geography, from the smallest (census block) to the largest (nation as a whole).

The American Community Survey, on the other hand, consists of a sample of households, with data being collected continuously. The ACS covers a large number of subject areas and new data sets are released annually. Tabulations based on one year’s accumulation of data are available for geographies with populations of 65,000 or more and three-year data is available for geographies with populations of 20,000 or more. An accumulation of five years of ACS data is required for geographic areas with populations less than 20,000, with the block group being the smallest unit of geography for which ACS data is tabulated. The diagram below illustrates the various geographies for which census data is tabulated.
Data from the 2011-2015 American Community Survey at the block group level have been used to identify the current EJ Target Groups and Areas. Identification of Minority, Low-Income, Elderly, People with Disabilities, and Zero-Car Household populations were accomplished using Tables B03002, B17021, B01001, B23024, and B25044, respectively. The following table shows the number and percent of each EJ Group in the OKI region. The Percent figures for each EJ Group constitute the regional threshold.

<table>
<thead>
<tr>
<th>EJ Group</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority</td>
<td>408,882</td>
<td>20.18</td>
</tr>
<tr>
<td>Low Income</td>
<td>278,126</td>
<td>14.05</td>
</tr>
<tr>
<td>Elderly</td>
<td>266,065</td>
<td>13.13</td>
</tr>
<tr>
<td>Disabled</td>
<td>127,929</td>
<td>10.69</td>
</tr>
<tr>
<td>Zero Car</td>
<td>65,019</td>
<td>8.33</td>
</tr>
<tr>
<td><strong>Regional Total</strong></td>
<td><strong>Population</strong></td>
<td><strong>100</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Households</strong></td>
<td><strong>100</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Population Ages 20-64</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

Block groups were eligible for designation as EJ Target Groups if they met two criteria. First, the block group’s EJ population (households in the case of the Zero-Car EJ group) had to meet or exceed the regional threshold. Secondly, the block group’s EJ population/households had to meet or exceed 250.
Additionally, for the Minority and Low-Income variables the margin of error was evaluated using the criteria that is discussed on page 24 of this document.

The threshold percentages for each EJ population are shown in the table below, along with the regional total of each Target Group, the percentage of the EJ population group located in the Target Areas, and the number of Census Block Groups in the Target Areas. Maps of the 2015 Target Areas are provided on subsequent pages.

Table A-2. 2011-2015 EJ Target Groups/Areas for the OKI Region

<table>
<thead>
<tr>
<th>Target Group</th>
<th>Regional Threshold (%)</th>
<th>EJ Population in Target Areas</th>
<th>% of EJ Pop. in Target Areas</th>
<th>No. of Block Groups in Target Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minority</td>
<td>20.18</td>
<td>291,072</td>
<td>71.19</td>
<td>475</td>
</tr>
<tr>
<td>Low Income</td>
<td>14.05</td>
<td>176,143</td>
<td>63.33</td>
<td>377</td>
</tr>
<tr>
<td>Elderly</td>
<td>13.13</td>
<td>125,077</td>
<td>47.01</td>
<td>346</td>
</tr>
<tr>
<td>Disabled</td>
<td>10.69</td>
<td>10,576</td>
<td>8.27</td>
<td>36</td>
</tr>
<tr>
<td>Zero Car Households</td>
<td>8.33</td>
<td>9,445</td>
<td>14.53</td>
<td>27</td>
</tr>
</tbody>
</table>
Figure A-2. EJ Minority Target Areas 2011-2015

- Block Groups
- EJ Minority Block Groups
Figure A-3. EJ Low Income Target Areas 2011-2015

- Block Groups
- EJ Low Income Block Groups
Figure A-4. EJ Elderly Target Areas 2011-2015

Block Groups
EJ Elderly Block Groups
Figure A-5. EJ Population with Disabilities Target Areas 2011-2015

Block Groups
EJ Disabilities Block Groups
Figure A-6. EJ Zero-Car Household Target Areas 2010

Block Groups
EJ Zero Car Block Groups
Figure A-7. Combined EJ Target Areas 2011-2015

Block Groups
EJ Block Groups