



PARTICIPATION PLAN 2022



OKI Participation Plan

February 2022

Ohio-Kentucky-Indiana Regional Council of Governments

720 East Pete Rose Way, Suite 420

Cincinnati, Ohio 45202

513-621-6300

www.oki.org

The preparation of this document was financed cooperatively by the Federal Highway Administration; the Federal Transit Administration; the Commonwealth of Kentucky Transportation Cabinet; the Ohio Department of Transportation; the Indiana Department of Transportation; and the local and county governments within the OKI region. The opinions, findings and conclusions expressed in this document are those of the OKI Regional Council of Governments; and they are not necessarily those of the U.S. Department of Transportation (U.S. DOT). This report does not constitute a standard, specification, or regulation.

OKI 2022-03

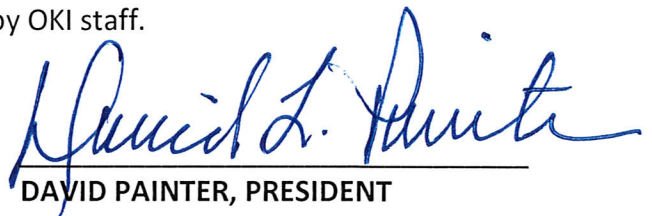
**RESOLUTION
EXECUTIVE COMMITTEE
OHIO-KENTUCKY-INDIANA REGIONAL COUNCIL OF GOVERNMENTS
AUTHORIZING ADOPTION OF THE UPDATE TO THE
OKI PARTICIPATION PLAN**

WHEREAS, the Ohio-Kentucky-Indiana Regional Council of Governments has adopted a Participation Plan that meets the planning regulations of Fixing America's Surface Transportation (FAST) Act at all levels as part of a comprehensive public / community outreach; and

WHEREAS, the Participation Plan is periodically updated by OKI staff to ensure consistency with federal regulations and guidelines; and

WHEREAS, OKI staff has incorporated the most current data and processes to deliver an effective program: Now, therefore,

BE IT RESOLVED, that the Board of Directors of the Ohio-Kentucky-Indiana Regional Council of Governments, at its regular public meeting of February 10, 2022, hereby adopts the update to the OKI Participation Plan as recommended by OKI staff.



DAVID PAINTER, PRESIDENT

FP

2/10/22

Acknowledgements

The Federal Highway Administration (FHWA); the Federal Transit Administration (FTA); the Ohio Department of Transportation (ODOT); the Kentucky Transportation Cabinet (KYTC); and the local and county governments within the OKI region financed the preparation of this document cooperatively.

The opinions, findings and conclusions expressed in this document are those of the Ohio-Kentucky-Indiana Regional Council of Governments (OKI); and they are not necessarily those of the U.S. Department of Transportation (U.S. DOT). This report does not constitute a standard, specification, or regulation.

OKI

Mark R. Policinski, Executive Director

Robert Koehler, Deputy Executive Director

Communications

Lorrie Platt, Manager of Communications and Legislative Affairs

Florence Parker, Senior Planner and Public Involvement Specialist

Jim Pickering, Communications Specialist

Suzanne Parkey, Sr. Digital Communications Strategist

Transportation Improvement Program (TIP)

Andy Reser, Transportation Programming Manager

Transportation Planning

Robyn Bancroft, Strategic Initiatives Manager

Brandon Rudd, Senior Planner/Demographer

OKI Environmental Justice Advisory Committee Members

Adam Goetzman, Committee Chair, Green Township

Megan Bessey, Planning and Development Services of Kenton County

Karla Boldery, La Mega Media

Scott Brown, Ohio Department of Transportation – District 8

Polly Doran, Council on Aging of Southwestern Ohio

Gina Douthat, Transit Authority of Northern Kentucky (TANK)

James A. Foster, City of Trenton Economic Development

Allan C. Harris, Cincinnati NAACP; National Technical Association – Cincinnati Chapter

Joyce Kinley, Kinley and Associates

Erin Lynn, City of Fairfield Planning

Cindy M. Minter, Campbell County Planning & Zoning

Rosalind Moore, City of Forest Park

Pamela Mullins, Resident, Covington, Kentucky

Keith Smith, Ohio Department of Transportation – District 8

Table of Contents

INTRODUCTION: CONTEXT FOR POLICY DEVELOPMENT	6
 ELEMENT 1: PARTICIPATION POLICY AND PROCESS	
Introduction	8
OKI's Organizational Structure.....	8
Range of Participation Efforts	10
Administrative Modification	13
Participation Policy	15
Participation Process.....	15
• General Provisions for Public Meetings.....	15
• Participation Process for Metropolitan Transportation Plan Update	17
• Participation Process for TIP Update	18
• Participation Process for Amendments to the TIP and Metropolitan Transportation Plan	18
• Corridor and Special Studies	19
• Other Provisions for Involving the Public	22
Amending the Participation Plan	23
 ELEMENT 2: PROCESS FOR DEFINING TARGET GROUPS AND AREAS	
Introduction	24
Environmental Justice Population Groups and Areas.....	24
Target Definition Policy.....	26
Target Groups and Areas	27
 ELEMENT 3: ASSESSING PARTICIPATION EQUITY	
Introduction	28
Participation Assessment.....	28
 ELEMENT 4: PLAN IMPLEMENTATION	
Administration of Participation Plan.....	30
Environmental Justice Advisory Committee	30
Technical Support for Plan Implementation	31
Evaluation of Participation Plan.....	33

Tables and Figures

Page

Tables

1-1 Transportation Conformity Exempt Project Types	20
A-1 Year 2015-2019 EJ Groups for the OKI Region	36
A-2 Year 2015-2019 EJ Target Groups/Areas for the OKI Region	36

Figures

1-1 Public Participation and Conformity Decision Tree for Changes to Plan and TIP	12
A-1 Standard Hierarchy of Census Geographic Entities.....	35
A-2: EJ Minority Target Areas 2015-2019	37
A-3: EJ Low Income Target Areas 2015-2019	38
A-4: EJ Elderly Target Areas 2015-2019	39
A-5: EJ Population with Disabilities Target Areas 2015-2019	40
A-6: EJ sZero-Car Household Target Areas 2015-2019	41
A-7: Combined EJ Target Areas 2015-2019	42

Introduction: Context for Policy Development

The Ohio-Kentucky-Indiana Regional Council of Governments (OKI) is the regional planning and intergovernmental coordination agency for the Greater Cincinnati metropolitan area. OKI's planning area covers nearly 200 local governments in a tristate area composed of Butler, Clermont, Hamilton, and Warren counties in Ohio; Boone, Campbell, and Kenton counties in Kentucky; and Dearborn County in Indiana.

As the designated Metropolitan Planning Organization (MPO) for the Ohio, Kentucky and Indiana counties in its region, OKI is responsible for the development of a long-range plan and a short-range programming document for transportation, as well as other planning initiatives. Civic engagement concerns apply to the broad spectrum of transportation investments and impacts considered in metropolitan planning, as well as individual projects recommended by OKI.

Notices of public participation activities and time established for public review of and comments on the Transportation Improvement Program (TIP) shall also satisfy the Program of Projects (POP) requirements for the Butler County Regional Transit Authority; Clermont Transportation Connection; City of Middletown Transit System; Southwest Ohio Regional Transit Authority; Transit Authority of Northern Kentucky; and Warren County Transit System for all projects funded through the Federal Transit Administration.

This updated Participation Plan carries forward many of the elements of the existing Plan updated in January 2018. However, some key changes have been made including:

- Addition of a process and procedures for conducting video or teleconferencing
- New criteria for defining Environmental Justice communities

As a public agency that receives federal funds and makes recommendations on federal expenditures, OKI is bound by participation requirements for ensuring that federal funds are used fairly and without discrimination. And, per Title 49 U.S.C. Chapter 53, to ensure that the requirements of its transportation planning processes are met for flexible funded projects, including project selection requirements.

The basis for EJ is Title VI of the Civil Rights Act of 1964, which states:

No person in the United States shall, on the grounds 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.

Participation, and/or civic engagement has become a prominent issue for public agencies as the result of a series of federal orders that serve to amplify Title VI. These include:

- FAST Act (Fixing America's Surface Transportation) effective Dec. 4, 2015
- Moving Ahead for Progress in the 21st Century Act (MAP-21) effective Oct. 1, 2012

- SAFETEA-LU Act (Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users)
- Federal Highway Administration Order in 1998
- U.S. Department of Transportation Order in 1997
- President Bill Clinton issued Executive Order 12898 in 1994, which directed every federal agency to make EJ part of its mission by identifying and addressing the effects of all programs, policies and activities on minority and low-income populations.
- The U.S. Department of Transportation issued Departmental Order 5610.2(a) (Actions to Address Environmental Justice in Minority Populations and Low-Income Populations). This order updates the Department's original Environmental Justice Order 12898. The order continues to be a key component of the Department's strategy to promote the principles of EJ in all departmental programs, policies and activities.
- Section 504 of the Rehabilitation Act of 1973
- For agencies like OKI, the orders issued by federal departments clarified the need to involve the potentially affected public in transportation decision-making processes and assess the equity of transportation investments. The targets of the Participation Plan are the entire public, but provide for additional consideration of EJ minority and low-income populations. OKI has expanded its efforts to include the elderly, disabled, and residents living in zero-car households.
- In August 2000, President Bill Clinton issued the Federal Executive Order No. 13166, "Improving access to services for persons with Limited English Proficiency (LEP) ... to improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency ..." President George W. Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on Oct. 25, 2001, which directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

This Plan contains the following four distinct but related elements:

Element 1: Presents a policy and process for involvement including focused special efforts to involve EJ target populations.

Element 2: Describes a process for defining the population groups and areas in the OKI region to be targeted for EJ processes.

Element 3: Describes a process for assessing the equity of transportation investments on EJ target populations.

Element 4: Lists the initiatives that OKI will undertake to support the implementation of this plan.

Element 1: Participation Policy and Process

Introduction

OKI seeks public participation as a means of developing effective solutions that can be implemented to address regional issues and needs. To develop solutions that account for the region's diversity, OKI seeks participation from a broad expanse of its geographic region, as well as the many sectors of its population. To address EJ, OKI makes special efforts to involve minority and low-income population groups per Executive Order 12898; but it also chooses to track three additional population groups, which are the elderly, people with disabilities, and residents who live in zero-car households. Many of these special efforts are focused on areas where EJ populations are most prevalent (terms are defined in Element 2 of the Participation Plan).

In response to federal directives, this plan accounts for the Clean Air Act Amendments of 1990 and federal requirements referenced in the FAST Act. Together, these federal initiatives have greatly enhanced the role of participation in metropolitan-level planning.

Element 1 of the Participation Plan outlines OKI's strategy and structure used to engage the public in regional planning and agency decisions that may affect their quality of life. The success of efforts to engage the public to participate depends upon the:

- Methods employed to publicize opportunities for participation
- Access to information for education or comment
- Type and format of information provided
- Timing of participation in terms of frequency and correlation to final decision-making
- Opportunities for dialogue and comment
- Consideration given to public comments and discussion
- Incorporation of public participation

OKI'S Organizational Structure

Independent of OKI's Participation Plan, the public is involved in OKI decision-making through provisions in the agency's organizational structure. This structure is related to OKI's establishment as a public, non-profit organization under the Ohio Revised Code. Agency structure, responsibilities and authority are described in the OKI Articles of Agreement.

The structure of OKI includes four standing committees that involve public officials and others in the development of plans, programs and policy adoption. These committees are the Board of Directors; the Executive Committee; the Intermodal Coordinating Committee (ICC); and the Environmental Justice (EJ) Advisory Committee. In 2000, the OKI Board established the EJ Advisory Committee to ensure participation from and to address the needs of EJ population groups. Additional opportunities for direct participation are provided by interim groups – such

as task forces, stakeholder groups, or subcommittees, which are established for specific purposes for a short time.

As legally required, OKI's policy-level committees are dominated by public officials that represent local governments and major transportation and planning agencies. Other public organizations, as well as individual citizens, also serve on these committees. The times and agendas of committee meetings are made available in advance by notification placed on OKI's website. All meetings are open to the public. Board and committee composition and major functions are summarized below.

- The **Board of Directors** governs OKI and is responsible for regional policy decision-making. Two-thirds of the members are elected officials; the other third comprise representatives of local planning agencies, community groups, the private sector, and individual citizens. The Board meets quarterly. The Executive Committee is drawn from its membership.
- The **Executive Committee** serves the Board by developing consensus on area-wide or multi-jurisdictional transportation policy matters. The Executive Committee can establish policy, adopt plans and resolve issues. It can also establish additional committees for advisory purposes. Executive Committee members constitute an elected official from each member county's governing body; a cross-section of local governments; and representatives from state transportation agencies, regional planning commissions, and transit agencies. The Executive Committee meets monthly.
- The **Intermodal Coordinating Committee (ICC)** is the technical advisory committee that advises the Board of Directors and Executive Committee on technical issues related to transportation planning. The ICC provides technical review and input to staff and the Executive Committee. Members include local traffic engineers and representatives of transit agencies, utilities, community and environmental groups, and state agencies. The ICC meets monthly, two days prior to meetings of the Executive Committee/Board of Directors.
- The **Environmental Justice Advisory Committee (EJ)** was established to oversee the implementation of the agency's EJ component of the Participation Plan. The committee's on-going work includes the review of funding applications and regional EJ efforts.

Other interim groups provide additional planning support for specific issues or projects. Members may include policy-makers, planning professionals, stakeholders, or individual citizens to provide policy and/or technical input to OKI decision-making processes. A group's membership, mission and duration are determined by the need it is addressing. Interim groups have provided planning support in areas such as corridor studies, long-range plan development and bicycle planning.

Range of Participation Efforts

The OKI Transportation planning program includes a wide range of outreach participation efforts, each with varying degrees of intensity based on the nature of planning effort, project type and federal requirements. This document outlines the approach, timing and level of intensity of the OKI participation efforts for the agency's primary planning activities.

Opportunities to participate in OKI's transportation decision-making are provided through the scheduled updates of the long-range planning and short-range programming elements of the planning process, as well as through the development of corridor or special studies. The term "update" as used herein refers to a major revision where the major planning assumptions are revised to reflect new base year population, employment, travel, estimates, or other data. An "amendment" refers to adjustments made to a plan or program in the intermediate years between updates.

One other mechanism permissible under federal planning guidelines available to MPOs is a "modification." Used almost exclusively for Transportation Improvement Plans (TIP), a modification allows for minor changes in project funding, timing or scope when a new air quality conformity determination is not required. A modification does not require public review or a solicitation for public comment. Figure 1-1: Public Participation and Conformity Decision Tree for Changes to Plan and TIP, which is illustrated below, is used to assist in determining the level of public involvement the agency will undertake for a given change to TIP.

Notices of public participation activities and time established for public review of and comments on TIP shall satisfy the Program of Projects (POP) requirements for the Butler County Regional Transit Authority; Clermont Transportation Connection; City of Middletown Transit System; Southwest Ohio Regional Transit Authority; Transit Authority of Northern Kentucky; and Warren County Transit System for all projects funded through the Federal Transit Administration (FTA).

Amendment

Amendment applies to a revision made to the Plan and the TIP. The type of change that can trigger an amendment includes major changes to:

- project cost,
- project phase initiation dates,
- design scope (e.g., changing project termini or the number of through traffic lanes), the
- addition or deletion of a project, or
- a major change that triggers the need for a new regional emissions analysis for transportation conformity per 40 CFR Part 93

An amendment is a revision that **does** require:

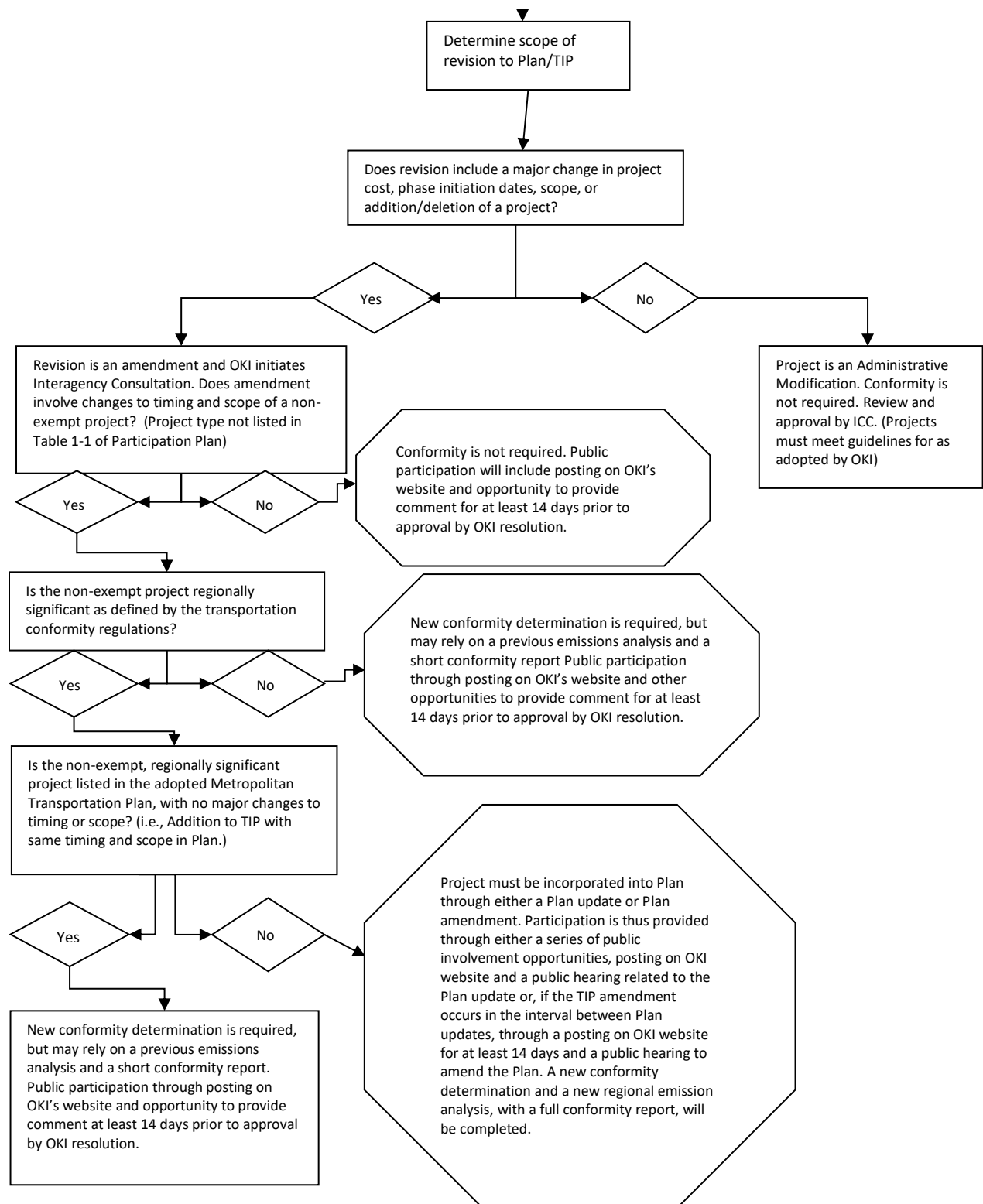
- public review and comment,

- re-demonstration of fiscal constraint, and a
- new transportation conformity determination (in air quality non-attainment and maintenance areas).

Definition and Function of the Interagency Consultation Group (ICG)

OKI initiates review and discussion by local, state and federal agencies. ICG will review the proposed changes to the Plan and TIP and begin an air quality conformity review, if needed. In cases where an air quality conformity determination is needed, the interagency consultation process must be undertaken in accordance with OKI's Transportation Conformity Memorandum of Understanding (MOU) as adopted by the OKI Board of Directors. The Conformity MOU sets forth policy, criteria and procedures for demonstrating and assuring conformity of such activities applicable to implementation plans developed according to Part A, Section 110 and Part D of the Clean Air Act.

Figure 1-1 Public Participation and Conformity Decision Tree for Changes to Plan and TIP



Tip Administrative Modification

The following guidelines are used to determine if a change may be made using an administrative modification. If the change falls within these guidelines, an administrative modification may be used; changes that exceed these guidelines require an amendment. These guidelines were approved by the OKI Executive Committee in November 2021. Administrative modifications are reviewed and approved by the Intermodal Coordinating Committee.

Highway (FHWA Projects)	Transit (FTA Projects)
Revision to projects in TIP Grouped Project	Revision to projects in TIP Grouped Project
Phase funding revision within threshold (see below)	Project funding revision within threshold (see below)
Revision to TIP Fund Type of FY within TIP period	Revision to TIP Fund Type of FY within TIP period
Minor termini, scope, design, description, project name change (does not add/remove transportation feature)	Addition/removal/revision of FTA Activity Line Item (ALI) code
Sponsoring Agency revision	Quantity revision
Combining/Splitting of project/phase	Minor revision to project name or description (no scope added or removed)
All other minor changes to projects, groups, and/or TIP document	All other minor changes to projects, groups and or TIP document and/or TIP document
Unobligated projects/phases included in the TIP carried forward as part of next TIP update	Unobligated projects/phases included in the TIP carried forward as part of next TIP update

Revise the project phase funding amount in the TIP within the following thresholds for Highway (FHWA Projects):		Revise the project phase funding amount in the TIP within the following thresholds for Transit (FTA projects):	
Current Project Phase Cost	Amendment Needed if Project Phase Cost Changes More Than:	Current Project Phase Cost	Amendment Needed if Project Phase Cost Changes More Than:
\$1 to \$3,000,000	\$1,500,000	\$1 to \$600,000	\$300,000
\$3,000,000 to \$5,000,000	50%	\$600,000 to \$1,000,000	50%
\$5,000,000 to \$10,000,000	30%	\$1,000,000 to \$5,000,000	30%
\$10,000,000 or greater	20%	\$5,000,000	20%

- The **Transportation Improvement Program, (TIP)**, which is the short-range programming element of OKI's transportation planning process, schedules transportation projects for funding and implementation over a four-year period. The opportunity for participation is provided when the TIP is updated, which is every two years. Project amendments can occur routinely in the interim between updates. Notices of public participation activities and time established for public review of and comments on the TIP shall also satisfy the Program of Projects (POP) requirements for the Butler County Regional Transit Authority; Clermont Transportation Connection; City of Middletown Transit System; Southwest Ohio Regional Transit Authority; Transit Authority of Northern Kentucky; and Warren County Transit System for all projects funded through the Federal Transit Administration.

TIP includes a variety of projects, but capacity-expansion projects recommended in the Plan must be included in the TIP to be eligible for federal funding. These projects are selected and prioritized in coordination with local governments and the ICC. Prioritization is based on criteria that reflect the regional transportation goals found in the Plan, such as increasing safety, reducing congestion and improving economic vitality.

- **Corridor and Special Studies** focus on specific areas within the region or specific transportation issues. They are not conducted on a scheduled basis. The study recommendations are reviewed and adopted by the Board of Directors and incorporated into the Plan. Public participation is defined at the on-set of each study and provided for throughout the study's development.

Corridor and Special Studies are conducted for issues requiring detailed study. For Corridor Studies, the participation process is geared toward developing consensus for a solution among those who are most affected. For Special Studies, participation is most often designed to obtain technical or specialized input (such as in a bike plan or freight study). The participation opportunities provided during these studies tend to generate greater numbers of participants and more intense interest than other transportation planning processes. But the participants tend to be drawn from a relatively small geographic area or interest group.

Participation Policy

OKI's Participation Plan is designed to secure active and representative involvement from all segments of the community in planning and decision-making about regional planning issues, goals, problems, alternatives, and solutions. To accomplish this purpose, OKI commits to the following goals:

- **Enable** an early and active role for the public in the development of transportation plans and programs;
- **Identify** and invite a broad range of potentially affected and interested persons, with special efforts to identify EJ populations;
- **Tailor** techniques to meet the diverse needs of the public and the variety of planning activities;
- **Make** special efforts to secure participation and input from EJ populations, including the use of facilities and outreach methods that facilitate their participation;
- **Consult** the public about participation methods as well as planning issues;
- **Evaluate** participation processes and procedures periodically so that adjustments can be made for maximum effectiveness; and
- **Coordinate** with Ohio, Kentucky and Indiana statewide participation plans.

Participation Process

General Provisions for Public Meetings

Public meetings will be convened as forums for interactive discussion on a variety of planning studies, so as to receive input from community residents. When in-person meetings are not permissible or appropriate, OKI will conduct meetings using video or teleconferencing means.

To encourage meaningful participation by the public, OKI arrangements for public meetings will provide for the following:

- **Timing** so that public comment can be considered as part of the planning process prior to final decision-making;
- **Promotion** to reach a broad and diverse public;
- **Facility** locations that are accessible to people with physical disabilities and in compliance with the Americans with Disabilities Act (ADA); accessible to public transit, if available and appropriate to the particular study or project; geographically convenient and accessible to the majority of potentially impacted and interested stakeholders; and
- **Develop** strategies that promote participation and facilitate discussion by providing relevant information for public review and a viable opportunity for public comment and discussion.

The information or proposals for which public comment is sought may be presented in a variety of ways including, but not limited to, display boards, 3D models, handouts and audio visual presentations. OKI will present information in a form and style to be generally understood by the public. Terms commonly used only in the transportation planning field will be avoided or explained. Qualified personnel will be available for discussing the information and for answering questions from the public. The meetings will include some format for requesting and obtaining public input, which may include a question-and-answer session, survey, or comment form. OKI will continue to use social media platforms as appropriate.

OKI will strive to accommodate persons with special needs. In addition to ensuring that the facility for public meetings is ADA compliant, OKI will provide translation services upon request at no cost to the recipient; and it will participate in hearing relay services for individuals with hearing impairments. OKI is required to conduct a public meeting on a biennial basis, at a minimum, for its transportation planning process. The meeting will be held at OKI and may be conducted in conjunction with an ICC Meeting.

Notification Process for Public Meetings

OKI will use a variety of ways to attract the general public, elected officials and representatives of agencies and organizations to attend public meetings. At a minimum, these methods will include:

1. Place notices in general circulating newspapers and major minority newspaper(s) in their native language at least fourteen days in advance of the meetings;
2. Post a notice on OKI's website at least fourteen days in advance of the meetings;

3. Submit press releases to major newspapers and community papers and/or purchase a notice in appropriate media outlets at least fourteen days in advance of the meeting;
4. Notify OKI committee members;
5. Notify EJ organizations (i.e., agencies and organizations that serve or represent EJ populations) and selected media targeting EJ populations;
6. Utilize OKI's various social networks; and
7. Make documents to review and comment on at public meetings for the Plan and TIP adoption or amendment available at least fourteen days prior to the public meeting, which will coincide with the placement of a notice on the OKI website and in general circulating newspapers and major minority newspapers. Copies of draft documents will be placed at the OKI office and copies may also be requested from OKI.

The notification will include, at a minimum, 1) information on the public meeting subject; 2) location, time and link to join the video conference meeting; 3) locations where documents are available for review (if applicable); and 4) invitation to participate in the public meeting. Particular efforts will be made to encourage the participation of EJ populations.

Process for Public Comment and Response

Comments from public meetings will be recorded, reviewed and summarized in a document. A summary of comments will be presented to the OKI Board for its consideration prior to Board action on the item. Changes that are significantly different and/or raise new issues from the initial item presented to the Board for action will be made available for public comment. The OKI Board will determine if additional opportunity for public comment is warranted.

Process for Public Comment and Response

Comments on documents subject to public meetings may be made verbally or in writing at the public meeting or transmitted during the comment period.

Comments presented verbally at the public meetings will be recorded and documented. All comments submitted within the comment period will be reviewed and summarized in a document that includes staff responses. Staff responses will be made available to those who provided comment. A summary of comments will be presented to the OKI Board for its consideration prior to Board action on the item.

Participation Process for Metropolitan Transportation Plan Update

Due to the regional, macro-level, and conceptual planning recommendations generated by the Plan, outreach must be flexible to obtain optimal participation from the region's broad and diverse populations. For each Plan update, OKI will design a unique participation plan which takes advantage of the most current and effective techniques. To address EJ concerns, each Plan update will include an EJ component. Staff will report to ICC and the OKI Executive

Committee/Board at regularly scheduled meetings. Participation is critical to developing consensus so that recommendations will advance to implementation.

Notification Process for Public Meetings

The notification process for public meetings will be in accordance with the General Provisions for Public Meetings described above.

Process for Public Comment and Response

Comments from public meetings will be recorded and summarized in a format that includes staff analysis and responses. A summary of comments and responses will be presented to the OKI Board for its consideration prior to the Plan's adoption, and will subsequently be included, along with any Board modifications, as an appendix to the Plan. If the Plan is changed significantly from the original format made available for public comment and raises new issues, OKI will provide additional opportunity for public comment on the revised document.

Public Meeting

A public meeting will be held prior to adoption of the Plan update by the OKI Board in accordance with the General Provisions for Public Meetings discussed previously.

Participation Process for TIP Update

For comments on the TIP, OKI will maintain a separate record of comments for subsequent incorporation into the summary of comments prepared in conjunction with the public meeting on the TIP. If the TIP is changed significantly from the initial document made available for public comment and raises new issues, then OKI will provide additional opportunity for public comment on the revised document.

A public meeting will be held prior to adoption of the TIP update by the OKI Board in accordance with the General Provisions for Public Meetings discussed previously.

Participation Process for Amendments to the TIP and Metropolitan Transportation Plan (Plan)

In the intervals between updates, amendments to the TIP and the Plan will be documented in a resolution presented to OKI's ICC for consideration and then to the OKI Board for approval.

In accordance with FAST Act, participation plans should incorporate a recommended list of project types for which TIP and/or Plan amendments can be processed without a requirement for public review and a new transportation conformity determination. Table 1-1 lists project types that are exempt from a public review requirement and transportation conformity. Exemption of such projects would not deny the public the right for interested parties that are affected by transportation plans, programs and projects to be involved in the early stages or at

key decision points in the planning process, since the exempted projects are of types that are typically not identified through the planning process and/or are known to be non-controversial, negligible impact projects. A project for which public review is not required could be subject to public involvement requirements if OKI, in consultation with either the Kentucky Transportation Cabinet (KYTC), Indiana Department of Transportation (INDOT), Ohio Department of Transportation (ODOT), Federal Transit Administration (FTA) or Federal Highway Administration (FHWA), determines that public review is appropriate due to a potential for controversy, negative impacts, or public concern for any other reason.

For amendments involving non-exempt projects (project types not included in Table 1-1), public review and a new transportation conformity determination are required. OKI, in consultation with KYTC, INDOT, ODOT, FTA or FHWA, may determine that the amended projects are not regionally significant and, therefore, the new conformity determination may rely on a previous regional emissions analysis. In this case, the participation process will consist of posting the amendment and conformity report on OKI's website, and the opportunity to provide comment for at least fourteen days prior to OKI Board action.

If a TIP amendment involves a non-exempt, regionally significant project, it must be incorporated into the Plan to be eligible for federal funding, which involves either a Plan update or amendment. Participation is thus provided through either a series of public meetings and a public meeting related to the Plan update or, if the TIP amendment for a capacity expansion project occurs in the interval between Plan updates, through a public meeting to amend the Plan.

Corridor and Special Studies

Corridor Studies

Due to the discussion of local issues, which often generates intensive public interest, corridor studies are a major focus of OKI's participation efforts. For each corridor study, OKI will design a unique participation process to obtain optimal participation from the area's key stakeholders; a diversity of community and special interest groups; and the general public. To address EJ concerns, each corridor plan will include an EJ component for participation. At a minimum, each corridor study will have its own advisory group that oversees the study process and is involved in designing the participation process, study goals, problem definition, alternative solutions, and selection of preferred alternatives. In addition, each study may apply any number of other methods to provide public outreach or obtain public input. Participation is important for developing consensus so that recommendations will advance to implementation. Public Meetings are valuable to the process. They will be held at locations appropriate to attract stakeholder input.

Special Studies

For special studies that focus on specific transportation issues (such as a bike plan or a freight study), OKI will tailor an individual participation program based on project scope, funding and purpose. Efforts to involve the public may include developing a separate committee for the study duration as well as a combination of efforts to provide outreach and obtain input from affected organizations and the general public. Study recommendations incorporated into the Plan are subject to the participation efforts conducted as part of the Plan amendment process. Public Meetings are valuable to the process and will be held at locations appropriate to attract stakeholder input.

Table 1-1: Transportation Conformity Exempt Project Types

Safety

Railroad/Highway crossing	Skid treatments
Shoulder improvements	Adding medians
Increasing sight distance	Truck climbing lanes outside the urbanized areas
Traffic control devices and operating assistance	Lighting improvements
Railroad/highway crossing warning devices	Widening narrow pavements or reconstructing, rehabilitation, or replacement of bridges (no additional travel lanes)
Guardrails, median barriers, crash cushions	Emergency truck pullovers
Pavement resurfacing, restoration and/or rehabilitation	Safety roadside rest areas
Pavement marking	Changes in vertical and horizontal alignment *
Emergency relief	Truck size and weight inspection stations *
Fencing	Interchange reconfiguration projects *
Changes in access control for safety	Intersection signalization at individual intersections *
Hazard elimination program, highway safety improvement program	Intersection channelization *

Transit

Operating assistance to transit agencies	Construction of small transit passenger shelters and information kiosks
Purchase of transit support vehicles	Reconstruction or renovation of transit buildings and structures
Rehabilitation of transit vehicles	Purchase of new buses or rail cars to replace existing vehicles or for minor expansions
Purchase of office, shop, and operating equipment for existing transit facilities	Transportation corridor fringe parking facilities
Purchase of operating equipment for transit vehicles (e.g. radios, fare boxes, lifts, etc.)	Bus terminal and transfer points *
Construction or renovation of power, signal, and communications systems for transit	Construction of new bus or rail storage/maintenance facilities *
Alterations to facilities or vehicles in order to make them accessible for elderly and handicapped persons	

Air Quality

Continuation of ride-sharing and van-pooling promotion activities at current levels	Bicycle and pedestrian facilities
---	-----------------------------------

Other Minor Projects

Planning and technical studies	Acquisition of scenic easements
Engineering to assess social, economic, and environmental effects of the proposed action	Planting and landscaping
Noise attenuation	Directional and information signs
Emergency or hardship advance land acquisitions	Repair of damage caused by natural disasters, civil unrest, or terrorist acts

*Projects must meet criteria for categorical exclusion

Other Provisions for Involving the Public

OKI Website

To increase public awareness and understanding of OKI planning efforts and opportunities for participation, OKI will maintain a website (www.oki.org) with information on the agency, its planning activities, and special opportunities for participation. Information will be updated regularly.

Networking

Networking involves OKI staff presenting information and seeking opportunities for discussion to groups with a special interest in transportation planning. OKI will offer networking opportunities during the update of the Plan and in the intervals between Plan updates. A networking session may feature an explanation of the planning process, plan recommendations, or a planning issue and will include a question-and-answer session. OKI may distribute handouts, a survey form, or use other methods to provide information or obtain input. OKI will be available for networking in response to requests and will continue to promote its availability to EJ communities and organizations.

Additionally, OKI's analysis of roadways within the urbanized area is a critical element that will be provided to each individual State Highway Safety Plan (SHSP). The use of safety conscious planning workshops is a component of this process and furthers the interagency consultation efforts to implement projects and programs. Through such participation efforts, OKI ensures outreach to and input from local and regional safety stakeholders including, but not limited to, transit providers, elected officials, and staff from departments of environmental services, police, fire, emergency services and planning.

Other Outreach Methods

Independent of efforts to involve the public as described in preceding sections, OKI may make additional outreach efforts at any time. The outreach method and timing will be determined based on the need for education, the nature of the planning effort, and the audience to be reached. Methods for increasing public awareness of transportation issues or participation opportunities include, but are not limited to, social media, press releases, public service announcements, media briefings, newspaper articles, and coordination with EJ communities or organizations. Methods to provide for public education include, but are not limited to, social media, newsletters, information displays, fact sheets, brochures, a speaker's bureau, and information for distribution by EJ communities or organizations.

Additional Participation of EJ Populations

In addition to the efforts to involve EJ populations in OKI transportation planning as provided in the preceding sections, and in addition to the resources to improve communication with EJ populations as discussed in Participation Plan Element 4, there may be occasions in which

public comment is needed from one or more EJ populations or, perhaps for a corridor study, at a level more localized than which OKI is traditionally involved. In that case, OKI will seek to collaborate with the public and private organizations that represent or serve these special populations. This collaboration would involve working with agencies/organizations willing to present information to the people they serve or represent; provide space in their newsletters; allow meetings in their facilities, or otherwise serve as intermediaries. These agencies/organizations may include, but are not necessarily limited to, congregations, schools, neighborhood centers, housing associations, adult education centers, and sponsors of special events.

Availability of Data

In addition to drafts of the Plan and the TIP being available for review and comment, these and other documents and technical information will be available to the public in response to requests. Reproduction costs of more than 10 pages will be the responsibility of the party making the request.

Statement of Non-Discrimination

In carrying out this policy to involve the public in transportation plans and programs, discrimination against any person because of political or religious opinion or affiliation or because of race, creed, color, national origin, sex, age, income or disability is hereby prohibited.

Amending the Participation Plan

In accordance with FAST Act legislation, this OKI Participation Plan is developed “in consultation with all interested parties.” This consultation requirement is intended to afford all parties who participate in the regional planning process a specific opportunity to comment on the Plan prior to its approval or subsequent amendment. The update process for this document – the OKI Participation Plan – is required four years after the document’s adoption and every four years thereafter. Revisions to this document will be preceded by a 45-day public review period. OKI is committed to consideration of public input.

Element 2: Process for Defining Target Groups and Areas

Introduction

Environmental Justice (EJ) is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Environmental Justice Population groups, referred to as “Target Groups,” are concentrations within the OKI region of the population groups addressed by EJ. These concentrations are located within “Target Areas.” The process for defining Target Groups goes hand-in-hand with the definition of Target Areas, and the terms Target Group and Target Area are often interchangeable.

OKI has defined Target Groups and Areas for five population groups: Minority, Low-Income, and Elderly populations; People with Disabilities; and Zero-Car Households. These target groups and areas are subject to special efforts in OKI’s Participation Plan, as described in Plan Elements 1 and 4. The minority and low-income target groups and areas are also the focus of an assessment of the equity of transportation recommendations, as explained in Plan Element 3.

The focus of Plan Element 2 is OKI’s process for defining target groups and areas. The process uses census data to identify where EJ population groups are most concentrated. The data and maps developed at the time of this plan’s publication are based on the most current available census data. The target groups and areas will be reviewed no less than every four years, in conjunction with the update of the Plan, and the definition process may be revised at any time.

As a two-step process, the definition of target groups and areas involves first identifying the general distribution of each EJ population group, and then defining where each group is most concentrated. Where the concentration of an EJ population group meets or exceeds 50% above the regional average and has an EJ population of more than 250, the EJ population is considered to be part of a target group and area. The definition process is based on small-area data that results in the identification of multiple, non-contiguous areas with EJ population concentrations. For each EJ population group, these dispersed concentrations are referred to collectively as a target group and the multiple locations of the concentrations are referred to collectively as a target area.

Environmental Justice Population Groups and Areas

Of the five population groups for which OKI defines target groups and areas, only the minority and low-income populations are listed in the Executive Order 12898 on Environmental Justice. The elderly population and people with disabilities are included in FAST Act, but they are not required to be addressed under EJ -- unless they are included in the finalized version of the federal rules. Zero-Car Households are a logical and reasonable extension of EJ, but this group is

not included in the executive order or the proposed rules. OKI chooses to track all five EJ population groups.

The composition of the five EJ population groups is defined in federal documents related to EJ and in U.S. decennial censuses and the American Community Survey (ACS).

Minority is composed of four groups as defined in final U.S. DOT Order on Environmental Justice (Federal Register April 15, 1997), which includes persons from every racial category except White Alone plus all Hispanic persons:

Minority is composed of four groups as defined in final U.S. DOT Order on Environmental Justice (Federal Register April 15, 1997) which includes persons from every racial category except White Alone plus all Hispanic persons:

- (1) Black (a person having origins in any of the black racial groups of Africa);
- (2) Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race);
- (3) Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands); or
- (4) 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).

Low Income, as defined in final U.S. DOT Order on Environmental Justice (Federal Register April 15, 1997), refers to people in households where the median income is at or below poverty level.

Elderly, as per Federal guidelines, comprises those age 65 and older.

People with Disabilities, non-institutionalized persons aged 16-64 who have a sensory, physical, mental or self-care disability; going outside the home disability; or employment disability.

Zero-Car Households, occupied housing units for which there is no car or access to one.

Target Definition Policy

For each EJ population group, the target group and area is the basis for conducting efforts under this Participation Plan. The target group lives where the EJ population group is most concentrated.

Typically low-income and minority populations are spread throughout the region and state, yet are more likely to be located in concentrated locations or neighborhoods. These areas should have a significantly higher percentage of low-income and minority populations than the regional or statewide average. These areas can then be identified as target areas.

Target groups and areas are defined based on U.S. Census data. Census data is available at different levels including place, township, census tract, block group and block. Block groups are subdivisions of a census tract and are the smallest geographic units for which the Census Bureau tabulates sample data needed in EJ analysis. Since block groups are more refined than census tracts, OKI will use U.S. Census data allocated to census block groups for the purpose of identifying target groups and areas. The target areas based on block groups will be used for individual project evaluation and for assessing participation equity.

OKI's definition process corresponds to ODOT's guidance for identifying target populations for low-income and minority populations. OKI has further expanded its process to include the elderly population, people with disabilities, and zero-car households by:

- Identifying the number and the percentage of low-income and minority populations in the entire OKI region, project impact region or the state
- Calculating the average percentage of low-income and minority populations of the entire region, project area or state
- Using that percentage as a reference point to identify locations where low-income and minority populations exceed the regional average by at least 50 percent.

As clarified in ODOT's "Guidance for Best Practices for Incorporating Environmental Justice into Ohio Transportation Planning and Environmental Processes," the average percentage is a reference point for calculating a threshold percentage for defining a target group and area. OKI has made the decision to more precisely target our communities of need by increasing the threshold to 50 percent above the regional average. In addition, OKI will apply a numeric threshold of 250 for defining a target group and area. The EJ populations in census block groups where the EJ population both exceeds the regional average by 50 percent, and there are more than 250 EJ persons (or households in the case of zero cars) will be defined as the target group. For example, for the minority population, the 2015-2019 regional average is 21.2 percent, which makes the threshold percentage 31.8 percent. The census block groups where the minority population is 31.8 percent or more of the block group's total population and the number of minority persons exceeds 250 are part of the target area that contains the target group population. It should be noted that the Census Bureau combines five years' worth of data

to create a larger sample size and a more accurate estimate because of the small size of block groups. The data represent an average condition over the course of the sample years, which in this case are 2015 through 2019.

Target Groups and Areas

The EJ Advisory Committee decided that any block group containing the regional average (regional threshold) or more of a target population (target group) and whose target population exceeded 250 would be considered a target area. Tables and maps displaying details about the current target groups/areas can be found in the appendix of this document. Target groups/areas can be updated annually if necessary as new data becomes available from the American Community Survey. Data updates will be provided in the appendices of the Participation Plan.

The data has been aggregated according to OKI's specifications and policies. Data have been gathered for low-income, minority, elderly, people with disabilities, and zero-car household groups in the OKI planning region.

Element 3: Assessing Participation Equity

Introduction

To address the needs for EJ populations, regional planning investments must provide an equitable distribution of benefits and should not result in a disproportionate burden of adverse impacts on minority and low-income population groups. To monitor public participation endeavors and ensure that the goals established by this Participation Plan are met, OKI has developed an assessment process.

Participation Assessment

The assessment process compares the impacts of the Plan and TIP recommendations on minority and low-income target areas with the entire region (target areas are defined in Element 2). The impacts are calculated by OKI's Regional Travel Demand Model for transportation mobility and accessibility.

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 and pollutant emissions. These impact measures are analyzed as a basis for recommending a plan or TIP.

In the Participation Plan assessment process, OKI uses the Travel Demand Model to estimate such things as traffic volumes, transit ridership and travel times as a basis for assessing the impact of transportation investments on EJ target and non-target areas. For assessing the Plan, which includes TIP, these EJ impact measures will be calculated for the following transportation scenarios:

1. The existing transportation system (base year)
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 Plan

OKI will use a variety of impact measures that relate to transportation mobility and accessibility. Some will be able to be estimated using the OKI Travel Model and others will require different approaches. Measures will be used from six general categories which are described below. Each of these categories will be reported by mode (auto vs. bus) and/or travel time, where appropriate. The following measures have been identified as objectives to be evaluated:

Mobility/Congestion

- Travel Time
- Percentage of vehicle miles traveled in congestion

Accessibility

- Job opportunities within 20 minutes auto travel time
- Job opportunities within 20 minutes transit travel time
- Job opportunities within 40 minutes transit travel time
- Percentage of population within 40 minutes transit travel time of a college/university

Reliability

- Dependable transit service as measured by percent of on-time arrivals

Safety

- Transit safety as measured by the number of crashes

Equity

- Supply of transportation infrastructure and services
- Displacement of residents and business
- Social Structure
- Expenditures on highway projects
- Expenditures on transit projects

Other Regional Performance Measures

- Environmental Impacts
- Financial impacts
- System performance indicators

From the data developed in the 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 disbursed 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.

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 use 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 a 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 OKI Metropolitan Transportation Plan, 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. 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.

Figure A-1. Standard Hierarchy of Census Geographic Entities

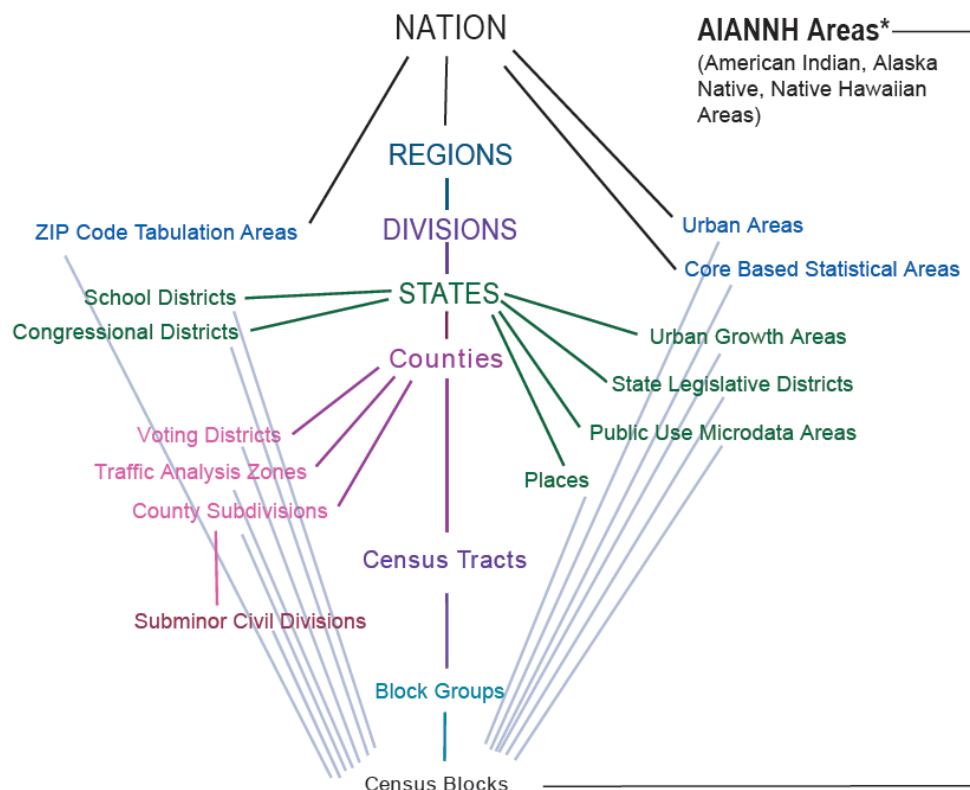


Figure A-1 Standard Hierarchy of Census Geographic Entities shows the hierarchy of Census Bureau-designated geographic entities. The largest is the nation, which is broken up into Regions, ZIP Code Tabulation Areas, Urban Areas, and Core Based Statistical Areas. Regions are further divided into Divisions, which are divided into the individual States. States are divided into Counties, School Districts, Congressional Districts, Urban Growth Areas, State Legislative Districts, Public Use Microdata Areas, and Places. Counties are divided into Census Tracts, Voting Districts, Traffic Analysis Zones, and County Subdivisions, which are further divided into Subminor Civil Divisions. Census Tracts are divided into Block Groups, which are further divided into Blocks. The Census Block is the smallest geography and is the building block for all the other geographies. There are also special AIANNH Areas, which stands for American Indian, Alaska Native, Native Hawaiian Areas.

Data from the 2015-2019 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, as well as the regional average plus 50 percent threshold.

Table A-1. 2015-2019 EJ Groups for the OKI Region

Environmental Justice Group	Number	Percent	Regional Average +50% (EJ Threshold)
Minority	436,093	21.2%	31.8%
Low Income	252,485	12.6%	18.9%
Elderly	294,510	15.9%	23.9%
People with Disabilities	128,216	10.7%	16.0%
Zero Car Households	64,085	8.0%	12.0%
Regional Total			
Population	2,055,662		
Households	802,121		
Population Ages 20-64	1,200,334		

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.

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 target areas are provided on subsequent pages.

Table A-2. 2015-2019 EJ Target Groups/Areas for the OKI Region

Target Group	Regional Threshold (Average +50%)	Environmental Justice Population in Target Areas	% of Environmental Justice Population in Target Areas	# of Block Groups in Target Areas
Minority	31.8%	266,820	61.2%	345
Low Income	18.9%	130,141	51.5%	264
Elderly	23.9%	54,846	18.6%	127
People with Disabilities	16.0%	7,374	5.8%	23
Zero Car Households	12.0%	9,754	15.2%	25

Figure A-2. EJ Minority Target Areas 2015-2019

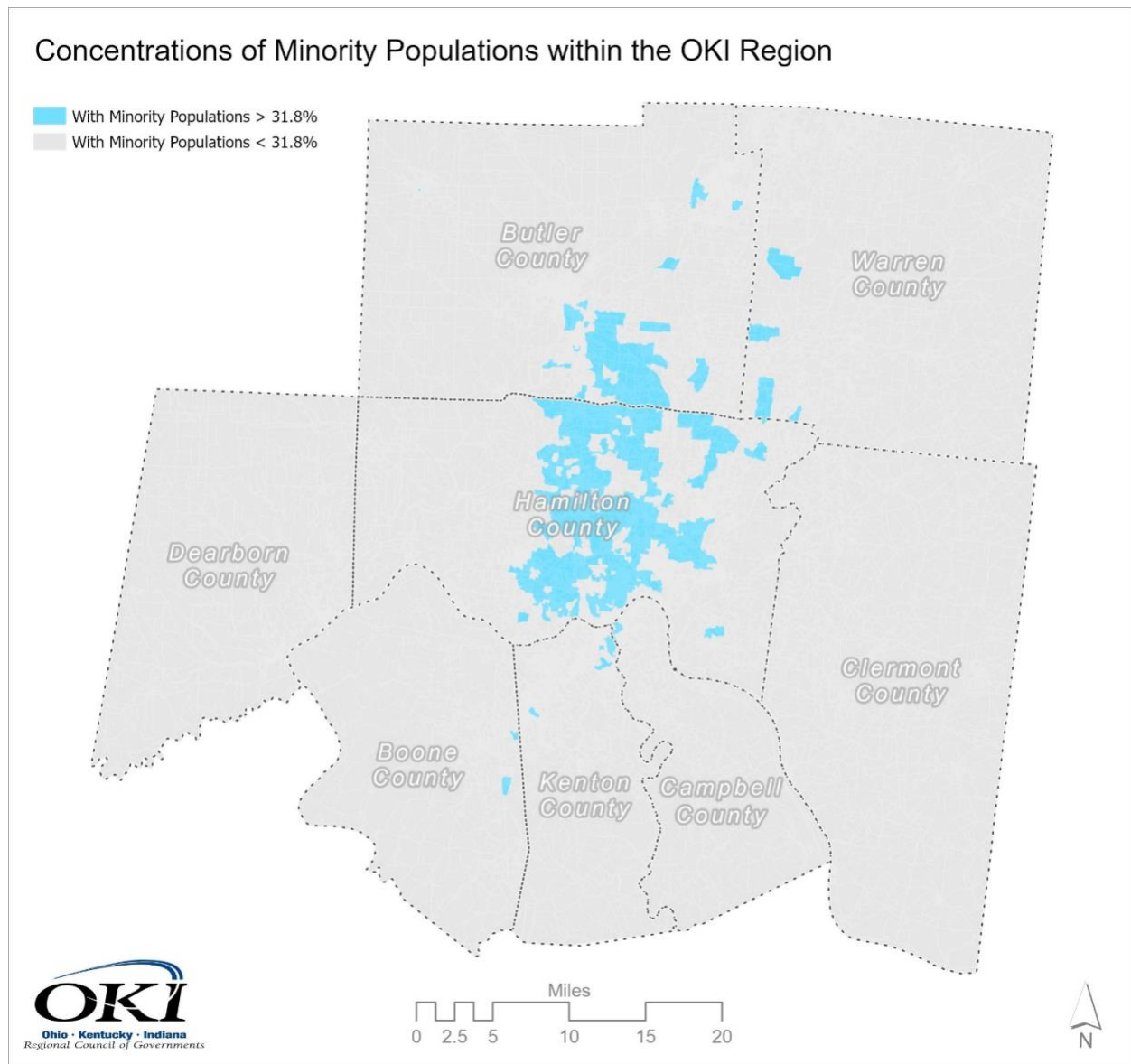


Figure A-2. EJ Minority Target Areas 2015-2019 map of the OKI Region depicts concentrations of minority populations, specifically Census block groups where the concentration is higher than the regional threshold of 31.8% and there are at least 250 total minority individuals. The map shows that minority populations are clustered mainly in the more urbanized parts of the region. This is primarily the City of Cincinnati and central Hamilton County extending north into southern Butler County, but also includes small areas in Boone, Kenton, Campbell, and Warren Counties.

Figure A-3. EJ Low Income Target Areas 2015-2019

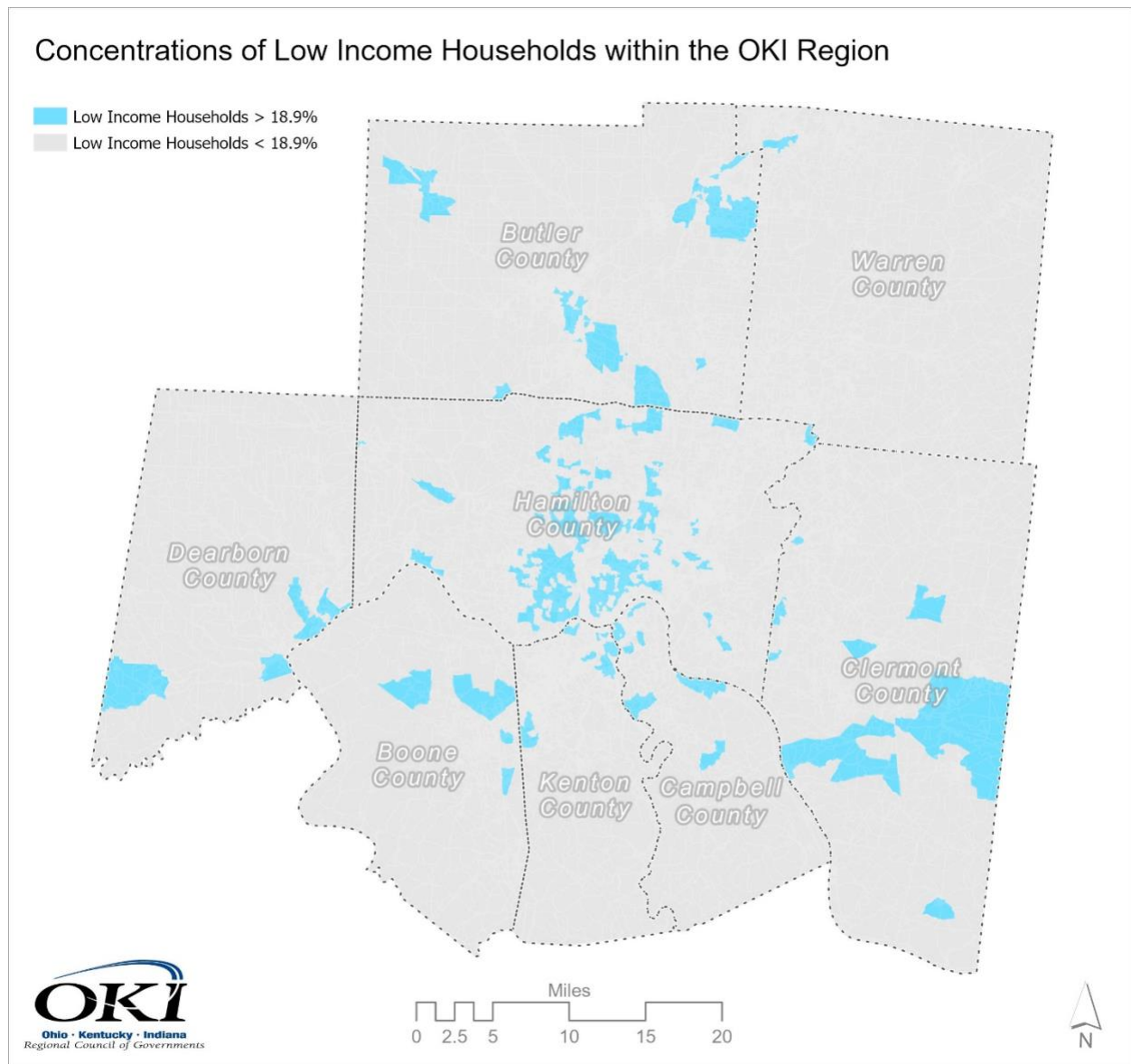


Figure A-4. EJ Elderly Target Areas 2015-2019

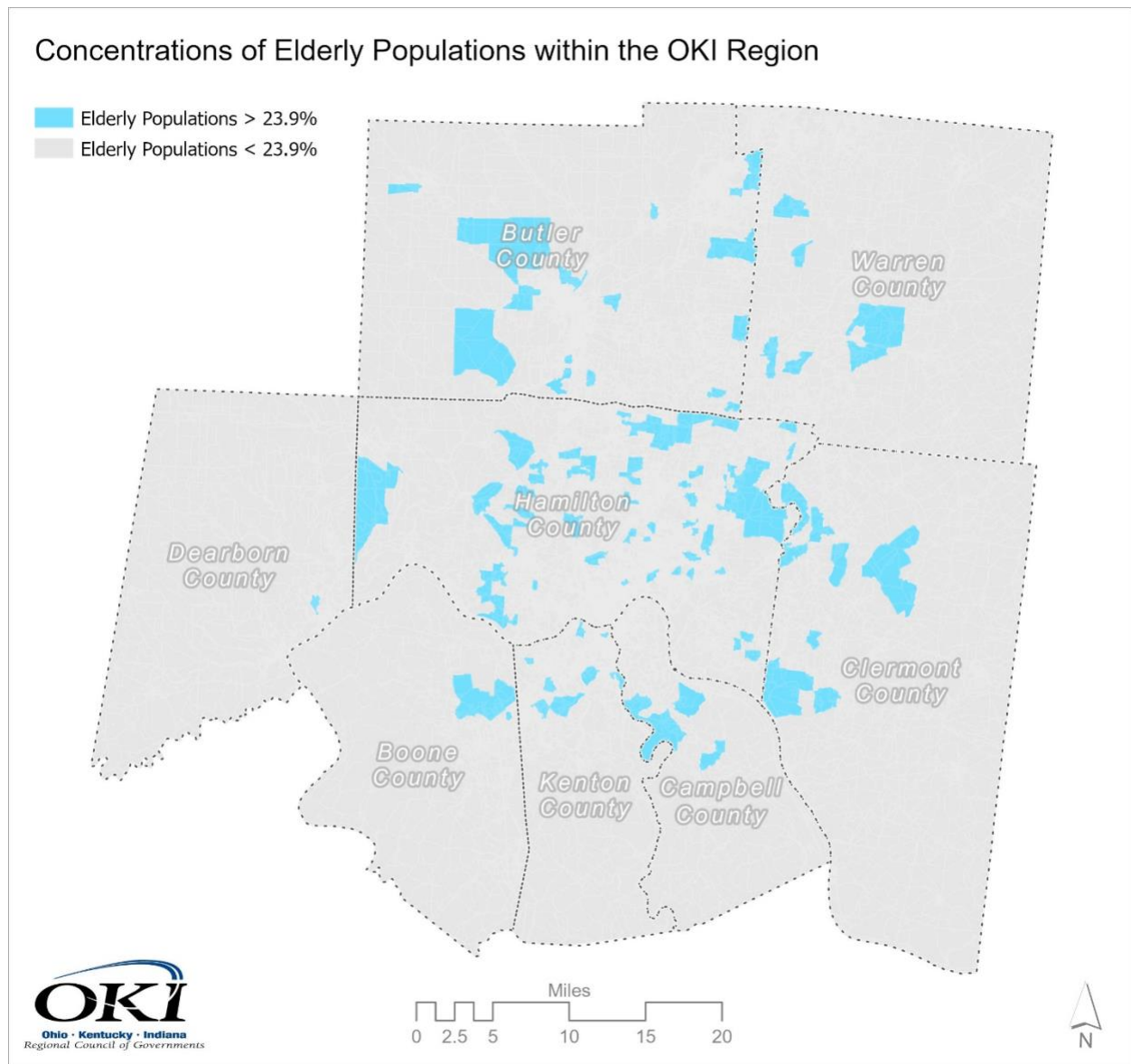


Figure A-4. EJ Elderly Target Areas 2015-2019 map of the OKI Region depicts concentrations of elderly populations, specifically Census block groups where the concentration is higher than the regional threshold of 23.9%, and there are at least 250 total elderly individuals. The map shows that concentrations of elderly populations can be found in every county in the region, mostly in suburban areas.

Figure A-5. EJ Population with Disabilities Target Areas 2015-2019

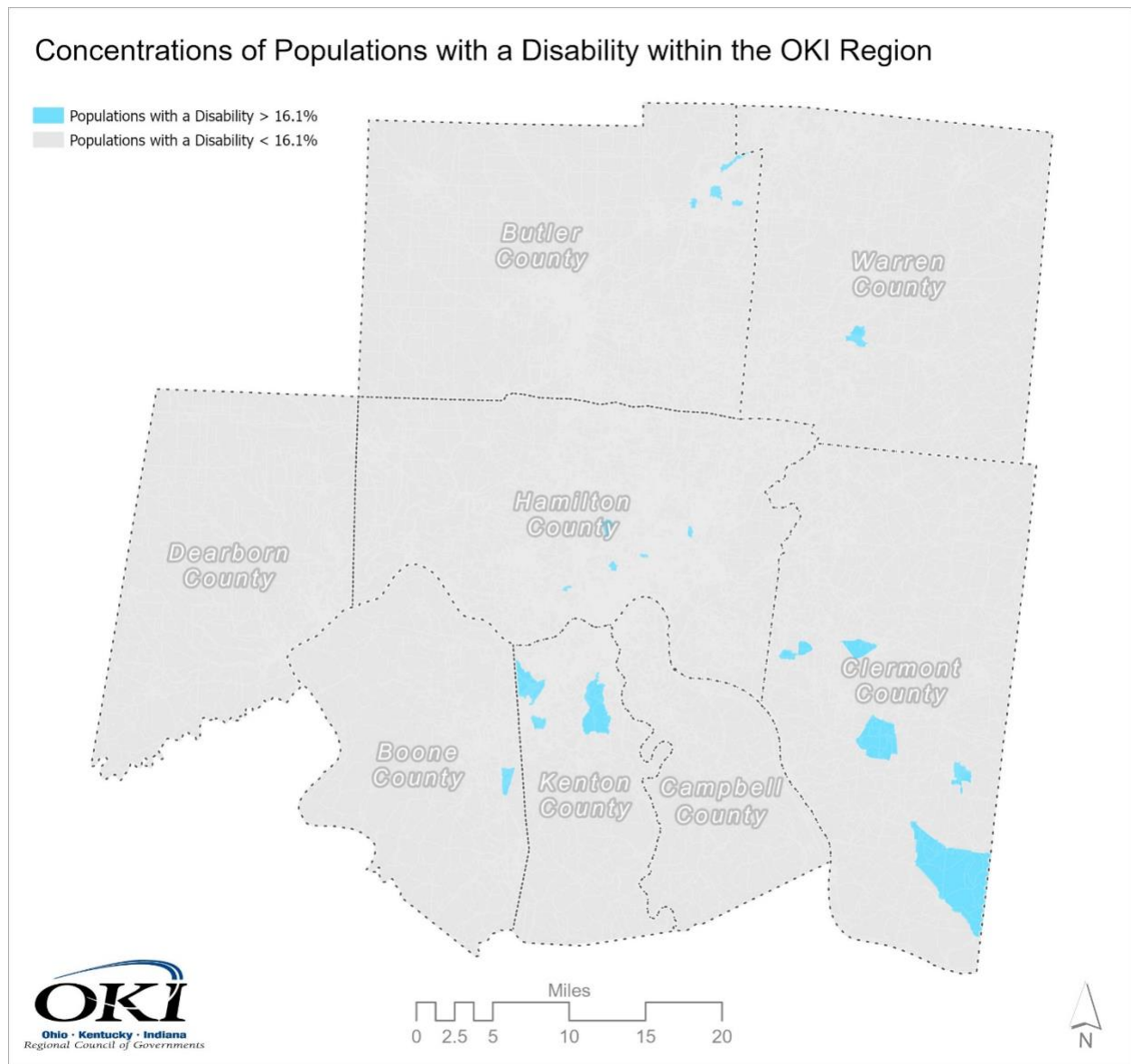


Figure A-5. EJ Population with Disabilities Target Areas 2015-2019 map of the OKI Region depicts concentrations of people with a disability, specifically Census block groups where the concentration is higher than the regional threshold of 16.1%, and there are at least 250 total individuals with a disability. There are very few areas that meet these criteria, and they are disbursed throughout the region in Hamilton, Warren, Butler, Clermont, Boone, and Kenton Counties. There are no areas that meet the criteria in Campbell or Dearborn Counties.

Figure A-6. EJ Zero-Car Household Target Areas 2015-2019

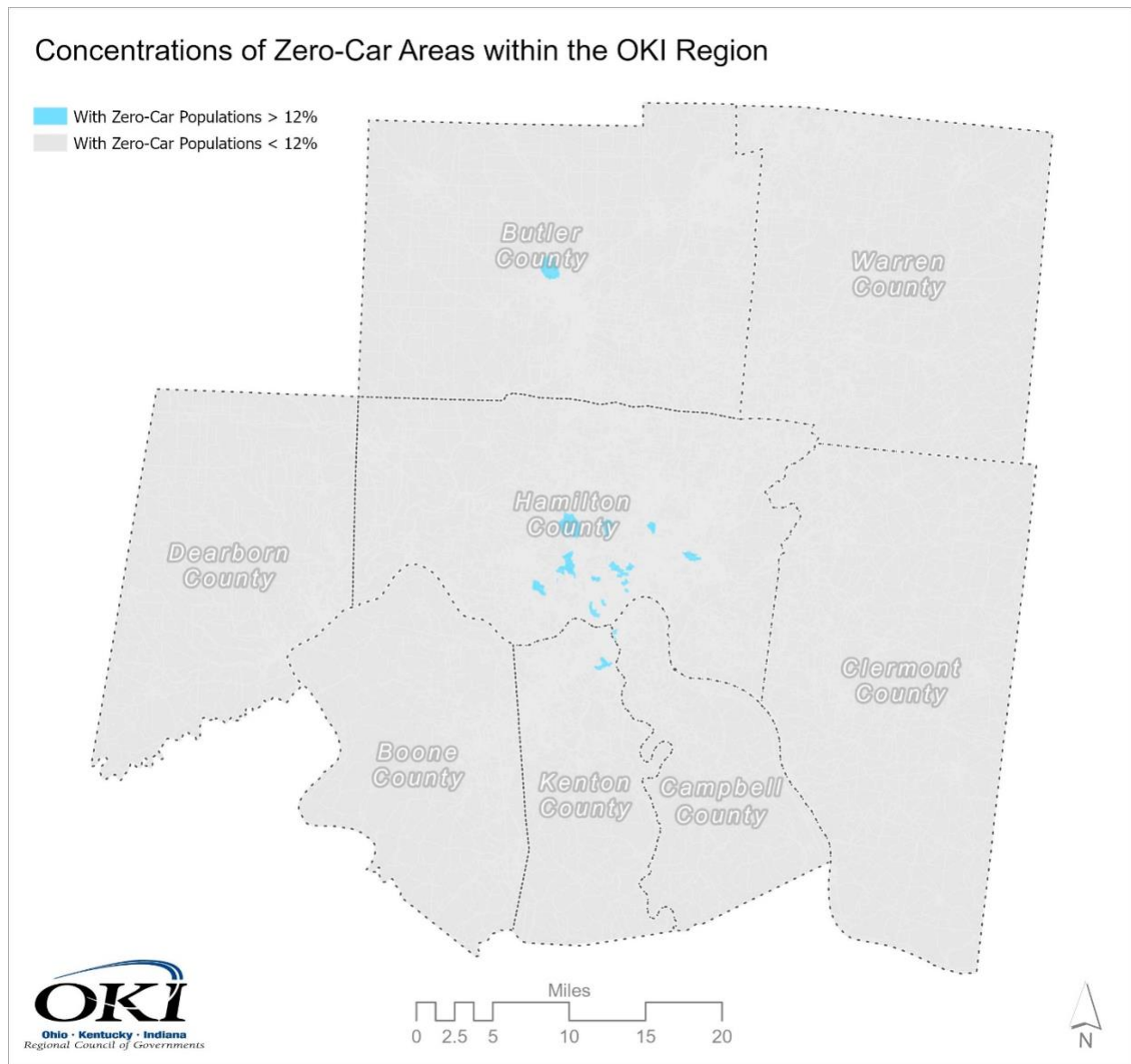


Figure A-6. EJ Zero-Car Household Target Areas 2015-2019 map of the OKI Region depicts concentrations of households with no access to a vehicle, specifically Census block groups where the concentration is higher than the regional threshold of 12%, and there are at least 250 total households with no access to a vehicle. There are very few areas that meet these criteria, and they are concentrated in the most urban parts of the region. Most of these areas are found within the City of Cincinnati, but there are also areas in Covington, Newport, and Hamilton.

Figure A-7. Combined EJ Target Areas 2015-2019

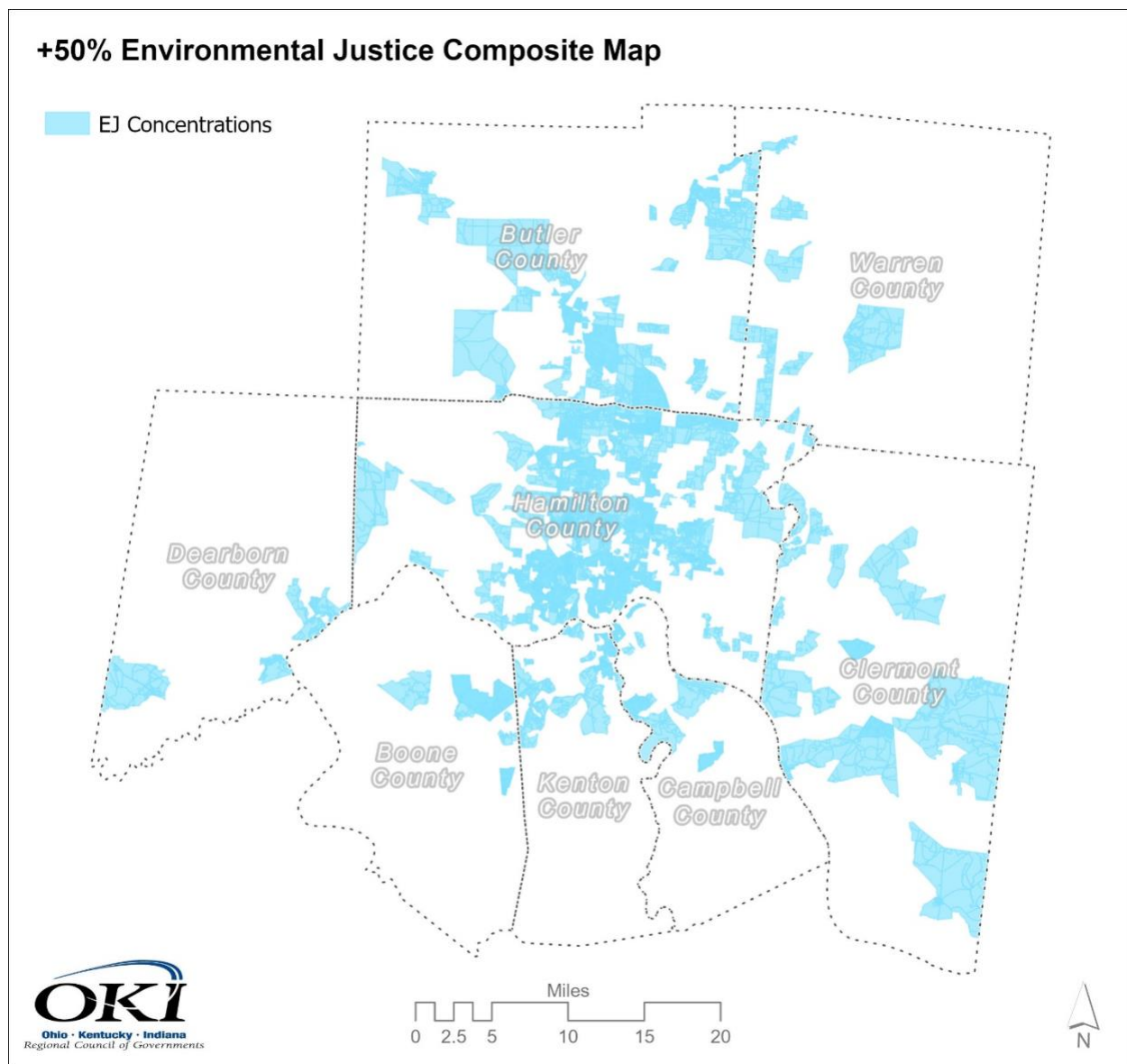


Figure A-7. Combined EJ Target Areas 2015-2019 map of the OKI Region depicts concentrations of every environmental justice group, specifically Census block groups where any of the environmental justice group concentrations surpass the regional thresholds and there are at least 250 individuals or households, depending on the variable. It is a composite map of all the previous maps. Areas that meet the criteria are highlighted and are in every county in the OKI Region. There is an especially high concentration in the City of Cincinnati and central Hamilton County, extending north into Butler County from the south-central portion of the county in an arc extending northwesterly. Concentrations also extend eastward into Clermont County and in an east-west band near I-275 in Northern Kentucky.