

**ENVIRONMENTAL JUSTICE (EJ)
PLANNING INFORMATION
and
BENEFITS & BURDENS ANALYSIS**

**FOR THE 2019 - 2022
TRANSPORTATION IMPROVEMENT PROGRAM**



ENVIRONMENTAL JUSTICE PLANNING INFORMATION

Formed in July 2003, the Lebanon County Metropolitan Planning Organization (LEBCO MPO) became familiar with the multitude of state and federal requirements pertaining to the transportation planning process. Using Title VI of the Civil Rights Act of 1964, Executive Order 12898 of 1994, and the Federal Highway Administration's 1998 Order on Environmental Justice requirements as a starting point, the LEBCO MPO has established a collaborative effort to ensure that adequate public involvement opportunities are available to all residents of Lebanon County and to avoid, minimize, or mitigate any adverse human health and environmental effects on the general public and particularly on minority and/or low-income populations during the transportation planning and programming process. Concerns over Limited English Proficiency (LEP – Executive Order 13166) are also being addressed by the LEBCO MPO.

The creation of a proactive public involvement process that reaches out to the broad spectrum of residents in Lebanon County will continue to evolve as the LEBCO MPO proceeds through the planning process. The following steps have been taken to comply with the aforementioned requirements:

BACKGROUND INFORMATION:

- On May 29, 2003, in preparation of becoming an MPO, staff of the Lebanon County Planning Dept. attended a Title VI Workshop sponsored by the Bureau of Equal Opportunity (BEO). Follow-up training and information was provided by BEO at PennDOT Planning Partners' Meetings over the years, and on January 12, 2012 BEO staff visited the LEBCO MPO and provided comments on how we can improve our processes. The LEBCO MPO staff also attended EJ benefits and burdens training by FHWA on April 18, 2012.
- As a part of the information packets for their initial meetings, copies of Publication No. FHWA-EP-00-013, ***An Overview of Transportation and Environmental Justice*** were distributed to members of the LEBCO MPO Technical Planning Committee and Policy Board and discussed.
- On September 4, 2003, the LEBCO MPO adopted the 8-page ***Transportation Planning Process Public Involvement Policy*** that addressed Federal Regulations, Public Involvement, a Demographic profile of Lebanon County, the MPO's Transportation Planning Process, Public Notice & Accessibility, Public Education and Public Involvement Goals and Methods of Public Education and Public Outreach and Involvement. That document has been updated and is now called the LEBCO MPO Public Participation Plan (PPP). The PPP has been updated periodically since then.
- All meetings of the LEBCO MPO Policy Board and Technical Planning Committee are advertised in one newspaper of general circulation at least 72 hours prior to each meeting. Ads include notification that, upon request, accommodations will be provided for persons with special language or transportation needs. Every meeting notice also includes information on how to file a complaint or how to obtain additional information from the LEBCO MPO. Additionally, all meetings are held in the City-County Municipal

Building, which is handicap accessible and situated on Lebanon Transit (LT) bus routes and is well within walking distance for many residents, especially minority and low-income populations.

- In addition to public advertisements, advance notices of MPO meetings are sent to each municipality and key agencies in Lebanon County. A yearly calendar of MPO meetings is also widely distributed throughout the county and posted on the LEBCO MPO web site.
- Based upon the 2000 and 2010 Census information, MPO staff analyzed and compiled demographic information to quantify and identify minority and low-income populations within the county. This information was displayed in tables and mapped using Census Bureau mapping capabilities. We have now done the same thing for the 2010 Census information (copies are attached).
- On April 25, 2004, staff of the Lebanon County Planning Department (LCPD), an Hispanic interpreter provided by the county, and a PennDOT staff person participated in the City of Lebanon's Unity Day event and operated a table to provide information on the LEBCO MPO, the transportation planning and programming process, and the 2005-2008 TIP. Notices, in Spanish and English, of the Public Comment Open House were distributed with free Pennsylvania maps. Also provided were informational packets explaining the responsibilities of the MPO and outlining TIP projects. Since the MPO planning process was still a new concept in the county at that time, most questions asked of the staff and interpreter dealt with the responsibilities of the MPO and transportation planning in general, rather than specific projects. Since then and up until several years ago, the LEBCO MPO regularly used Radio Omega to reach out to the Hispanic community in Lebanon County regarding transportation planning and programming and transportation project development. Unfortunately, Radio Omega went off the air. However, now the LCPD uses one full time City of Lebanon employees who speak fluent Spanish and two County of Lebanon employees, and they assist the MPO in any transportation matter where interpretation in Spanish is needed.
- Because the bulk of Lebanon's minority population, as well as many of its low-income families, lives in and around the City of Lebanon, it was decided to hold the Public Comment Open Houses for the 2017-2020 TIP/LRTP update in downtown Lebanon with access to Lebanon Transit (LT) bus service. Two separate Open House sessions were held, one in the afternoon and one in the evening, to facilitate increased attendance by all residents of the county.
- The LEBCO MPO completed a PennDOT/FHWA Planning Process Review in the fall of 2015. The final report is dated October 27, 2015. It states (1) that the MPO fully complies with the spirit and intent of all metropolitan transportation planning laws and regulations and (2) that the MPO is in compliance with Title 23 USC Section 134.

CURRENT INFORMATION:

- As a part of the FFY 2019-2022 Transportation Improvement Program (TIP) Public Comment Process and PennDOT's program update guidance, copies of the required TIP information were made available at the City of Lebanon, Annville, Cleona, Richland, Fredricksburg, Palmyra, and Myerstown public libraries, and at the Lebanon County Planning Department, Room 206, City of Lebanon Public Works, Room 220, Municipal Building, Lebanon, PA, Lebanon Transit Office, 200 Willow Street, Lebanon, PA and additional municipal offices throughout Lebanon County.
- In May, the Executive Director of the Lebanon County Human Services Community Action Partnership (CAP) was provided with copies of the draft TIP and a written notice, in both English and Spanish, announcing the Public Comment Open House on June 11th, 2018 from 2:00 p.m. to 4:00 p.m. and from 6:00 p.m. to 7:30 p.m. The Executive Director distributed the notices where appropriate throughout the social services community and to individuals as appropriate. Additionally the MPO staff have recently begun serving on Lebanon CAP Board which meets quarterly and allows another forum to share transportation planning information and receive additional feedback from several Lebanon County Community partners.
- On June 11th, 2018, two (2) Public Comment Open House sessions will be held in Room 207 (County Commissioners' Meeting Room) in the Lebanon Municipal Building which is centrally located in the City of Lebanon and within Lebanon County. It is accessible by public transportation. If needed, interpreters will be available for each of these sessions to assist the Hispanic community and Korean community to understand the transportation planning process and to provide an opportunity to record public comment from this segment of the community.
- On May 22nd, 2018, the MPO Technical Planning Committee will review this and other appropriate documents and assist with the responses to the public comments received with the start of the 30-day comment period. The comments and responses will be forwarded to the Policy Board for review and approval at the June 21st, 2018 MPO meeting. The Policy Board meeting will be open to the public and will be duly advertised in the Lebanon Daily News.
- It is also important to note that the LEBCO MPO adopted its first Title VI / Environmental Justice Implementation Plan on July 27, 2006 and does updates and status reports to remain current on these important outreach efforts.

FINDINGS: 2019-2022 TIP IMPACTS

- An assessment of the benefits and burdens of the LEBCO MPO FFY 2019 – 2022 Transportation Improvement Program (TIP) was completed to identify significant projects and to analyze the location of these projects relative to the location of minority and low-income populations.
- From the attached 2000 and 2010 Census information, it is very clear that the vast majority of minority, EJ, low-income and elderly populations within Lebanon County are concentrated in the City of Lebanon. The following transit projects will benefit these same residents:
 - SRTP Ridesharing Efforts in FFY 2019 (highway funded)
 - SRTP Ridesharing Efforts in FFY 2020 (highway funded)
 - SRTP Ridesharing Efforts in FFY 2021 (highway funded)
 - SRTP Ridesharing Efforts in FFY 2022 (highway funded)
 - LT Paratransit Vans (2) in FFY 2017
 - LT Paratransit Vans (2) in FFY 2018
 - LT Paratransit Vans (2) in FFY 2019
 - LT Paratransit Vans (2) in FFY 2020
 - LT Bus Replacement to CNG (6) in FFY 2019
 - LT Bus Replacement to CNG (2) in FFY 2020
 - LT Bus Replacement to CNG (3) in FFY 2021 & 2022
 - LT Operating Assistance in FFY 2019
 - LT Operating Assistance in FFY 2020
 - LT Operating Assistance in FFY 2021
 - LT Operating Assistance in FFY 2022
- The TIP transit projects listed above represent 70% of the number of TIP transit projects, but they add up to over 99% of the transit funds. While it is safe to say that a good deal of the benefits of transit service will rest with City of Lebanon residents, it must also be said that the percentage of LT ridership that comes from EJ populations is not known at this time.
- The LEBCO MPO continues to place most of its highway and bridge funds on bridge rehabilitation and replacement projects, box culvert replacements and roadway resurfacing projects scattered throughout the county, which are beneficial to the EJ community and all users of Lebanon County's highways and local roads/streets. The short-term construction impacts will be very minimal too, since little or no rights-of-way will need to be acquired.
- The TIP also contains several line items for future work that has yet to be identified.
- The Highway TIP contains no new capacity-adding highway projects. Therefore, there are no significant benefits or burdens derived from this type of project. And since the road resurfacing and routine maintenance projects are scattered throughout the county on various state and federal roads, they are considered beneficial to EJ and non-EJ

users, especially the planned resurfacing projects in the City of Lebanon on US Route 422 and on PA Route 72. In fact, there is little opportunity to spend state and federal highway/bridge dollars in minority and low-income communities, because these concentrations of people reside within the City of Lebanon where few federal routes and state routes (SRs) exist, and the newest and largest category of federal funds (National Highway Performance Program)(NHPP) from Fixing America's Surface Transportation (FAST) Act cannot be used in the vast majority of areas where EJ populations reside in Lebanon County.

- Deficient bridges or box culverts on the TIP are widely scattered throughout the county as well, with none of them being located in areas of minority and low-income concentrations.
- None of the county's top safety locations occur at intersections or along roadway segments in areas of minority and low-income concentrations. The two carryover safety projects are located along US Route 422 in Jackson Township and Myerstown Borough where few minority, low income and elderly residents live because it's a commercially-zoned corridor. The new corridor safety project on PA Route 241 is also located in a rural portion of the county where EJ and minority populations are absent.
- The Lebanon Valley Rails-to-Trails (LVRT) project (LVRT Phase 7) currently under construction in N. Lebanon Township will benefit EJ residents who walk and bike to key destinations in this township and in nearby West Lebanon Township. Additionally The LVRT and City of Lebanon School District recently received funding through PennDOT's TA Set-Aside to construct LVRT Phase 6A and pedestrian improvements as part of the Lebanon School District new Northwest Elementary School Site. These will provide significant improvement in connections and access for EJ and low income communities to nearby public facilities (parks, trails, schools, etc.)
- LEBCO MPO/Lebanon County Planning staff will continue working with Lebanon Transit on the completion of a bus shelter improvement project to be completed this year at identified locations across Lebanon County which includes several sites throughout the City of Lebanon that will improve access to LT services in areas of high concentrations of minority, EJ, and low income populations.
- In conclusion, it is clear that the ongoing LEBCO MPO public involvement efforts and the resultant 2019-2022 Transportation Improvement Program (TIP) demonstrate benefits to EJ and non-EJ communities. We see no burdens to EJ and non-EJ communities. Low-income and minority populations are not disproportionately impacted in a negative way. We believe they are beneficiaries of the transportation planning and programming process in Lebanon County. And the LEBCO MPO and the Lebanon County Planning Department will continue to work cooperatively with other public and private partners in order to continue to advance environmental justice and Title VI principles throughout the county.