ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS

ENVIRONMENTAL JUSTICE PLAN

2020
ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS

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The contents of this report reflect the views of the Association of Central Oklahoma Governments (ACOG), the Metropolitan Planning Organization for the Oklahoma City Area Regional Transportation Study (OCARTS) Transportation Management Area. ACOG is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect official views or policy of the U.S. Department of Transportation. This report does not constitute a standard, specification, or regulation.
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INTRODUCTION

METROPOLITAN PLANNING ORGANIZATION

The Association of Central Oklahoma Governments (ACOG) serves as the Metropolitan Planning Organization (MPO) for the Central Oklahoma region. This is in compliance with the provisions of the Federal Highway and Federal Transit Acts of 1962, as amended by the Fixing America’s Surface Transportation (FAST) Act, signed into law December 4, 2015. ACOG is a voluntary association of city, town, and county governments within the Central Oklahoma region. Established in 1966, ACOG’s purpose is to aid local governments in planning for common needs, cooperating for mutual benefit, and coordinating for sound regional development. Key functions of the MPO include:

- Establish a setting for effective regional decision-making
- Identify and evaluate alternative transportation improvement options
- Prepare and maintain the Metropolitan Transportation Plan (MTP)
- Prepare and maintain the Transportation Improvement Program (TIP)
- Implement Performance-based Planning and Programming (PBPP) initiatives in the MTP and TIP
- Involve the public

ACOG is responsible for transportation planning throughout the Oklahoma City Area Regional Transportation Study (OCARTS) area, containing all of Oklahoma County and Cleveland County and portions of Logan County, McClain County, Grady County, and Canadian County. See Appendix I for a map of the OCARTS area.

ACOG supports and manages a variety of missions aimed at improving the lives of Central Oklahomans by serving as the MPO for the region. In this capacity, ACOG’s primary role is to lead comprehensive, coordinated, and continuous transportation planning. As such, ACOG works with Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Oklahoma Department of Transportation (ODOT), area transit providers, local governments, the public and other stakeholders to prepare the MTP and TIP. The MPO planning process and planning products are prerequisites for Central
Oklahoma to receive federal transportation funding. The subsequent sections highlight a few of the major activities ACOG is involved with.

**METROPOLITAN TRANSPORTATION PLAN**

The Metropolitan Transportation Plan (MTP) is developed every five years by ACOG and includes priorities for the next 30 years. The MTP is a fiscally constrained plan that outlines future investment in multimodal improvements to support regional growth and ACOG goals. The plan includes recommendations for streets and highways, airport access, transit, freight movement, and bicycle and pedestrian ways. Encompass 2040, the current MTP for the OCARTS area, was adopted by the MPO in October 2016. As of December 20, 2017, the OCARTS area is an air quality attainment area, and therefore the MTP for Central Oklahoma is updated every five years. Encompass 2040 includes over $10 billion in multimodal transportation investment projects, including preservation of the existing system.

**TRANSPORTATION IMPROVEMENT PROGRAM**

The Transportation Improvement Program (TIP) is a cooperatively developed four-year program outlining multimodal transportation improvements and services to be implemented within the OCARTS area. The improvements and services implemented work towards achieving the goals of the MTP. Selected projects must receive ACOG committee approvals before they are forwarded onto ODOT and then to FHWA for approval. The TIP is also responsible for implementing and monitoring Performance-based Planning and Programming initiatives.

**UNIFIED PLANNING WORK PROGRAM**

The Unified Planning Work Program (UPWP) is a description of the proposed multimodal transportation planning activities to be conducted in the ACOG region during the fiscal year. The UPWP is prepared annually and serves as a basis for requesting federal planning funds from the U.S. Department of Transportation, as well as a management tool for scheduling, budgeting, and monitoring the planning activities of the participating entities. The UPWP presents the scope and direction of all transportation planning activities in the region and specifies which work program tasks will be accomplished during the fiscal year.
PUBLIC PARTICIPATION PLAN

The Public Participation Plan (PPP) is routinely updated by ACOG to document guidelines and standards when soliciting public comments on local transportation plans and programs. The plan includes descriptions of the public participation tools ACOG utilizes, the strategies and guidelines that are essential to public participation, and a series of performance measurements to be used to evaluate the effectiveness of the plan.

ENVIRONMENTAL JUSTICE OVERVIEW

Environmental justice is defined as the fair treatment and meaningful involvement of all people regardless of race, color, ethnicity, national origin, or income with regards to the development, implementation, and enforcement of laws, regulations, and policies. There are three fundamental principles of environmental justice:

- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process
- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations
- To prevent the denial of, reduction in, or significant delay of these protections (in the receipt of benefits) for minority and low-income populations

Non-discrimination of environmental justice populations is a federal requirement for all federal, state, and local agencies that receive federal funds. The two key federal actions that ensure this nondiscrimination are:

- Title VI of the Civil Rights Act of 1964
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations – signed by President Clinton on February 11, 1994

Title VI of the Civil Rights Act explicitly prohibits discrimination on the basis of race, color, and national origin in programs and activities that receive federal financial assistance. Executive Order 12898, on the other hand, instructs federal agencies to identify and address disproportionately high and adverse effects of federal programs, policies, and activities on low-income and minority populations.
The Department of Transportation (USDOT) in 1997 and the FHWA in 1998 (Order 6640.23) issued their own environmental justice orders that adopted and expanded upon the principles and requirements of Executive Order 12898. Environmental justice in transportation planning means identifying and addressing disproportionately high and adverse effects of federally-funded programs, policies, or activities on low-income and minority populations to ensure the equitable distribution of potential benefits and burdens.

The overall precept of environmental justice in transportation planning is to ensure that transportation projects do not have a disproportionately negative impact on minority or low-income populations. Beyond that, environmental justice also seeks to ensure the full and fair participation in every phase of the transportation decision-making process for those that have been traditionally underserved by the transportation planning process, particularly for those that will potentially be affected by projects.

**ENVIRONMENTAL JUSTICE PLAN**

ACOG is committed to ensuring fairness and equity in its transportation planning activities. ACOG’s approach to environmental justice is to ensure that transportation investments are evenly spread across all populations in terms of access to benefits and burdens.

The purpose of this environmental justice plan is to identify the region’s environmental justice populations and detect the region’s environmental justice communities of concern based on the most recent census data available. This plan will provide visualizations for the geographic distribution of environmental justice populations and communities of concern while also aid in identifying high density areas of environmental justice communities of concern. This plan should be used to evaluate planned transportation projects to see how they are distributed amongst the environmental justice communities of concern in the region.

ACOG will use this environmental justice plan to evaluate the following the MTP, TIP, UPWP, PPP, and other transportation planning activities.
FEDERAL REQUIREMENTS

Federal requirements for environmental justice involve the identification and analysis of the needs of minority and low-income populations. Specifically, the environmental justice populations identified by the FHWA include low-income populations and the following minority populations: Black or African American, Hispanic, Asian American, American Indian or Alaskan Native, Native Hawaiian or Pacific Islander.

However, the USDOT and the FHWA also advise for the inclusion of other populations, particularly those that have been traditionally underserved by existing transportation systems. Race, color, national origin, sex, age, disability, and persons with Limited English Proficiency (LEP) are groups that are protected by other federal laws and orders that should be considered when determining a region’s environmental justice populations.

Therefore, ACOG will take into consideration more groups than just the low-income and racial minority categories prescribed by the FHWA. Minority populations that ACOG included that are not federally required to include as environmental justice populations include elderly populations, young populations, populations with a disability, single female-headed households, Limited English Proficiency (LEP) populations, and zero-vehicle households. ACOG feels that these minority groups are often underrepresented in the transportation planning process and should be included in this environmental justice plan.

ENVIRONMENTAL JUSTICE POPULATIONS

The nine environmental justice populations that ACOG is concerned with and are considered in this plan are:

1. Racial minority populations
   a) Black or African American
   b) Asian
   c) American Indian or Alaskan Native
1. Racial minority populations (non-Hispanic)
Racial minorities defined by the U.S. Census Bureau (as guided by the 1997 Office of Management and Budget standards on race and ethnicity) are: Black, Asian, American Indian or Alaskan Native, Native Hawaiian or Pacific Islander, Some Other Race, and Two or More Races.

1(a). Black or African American
A person having origins in any of the Black racial groups of Africa.

1(b). Asian
A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

1(c). American Indian or Alaskan Native
A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment.
1(d). Native Hawaiian or Other Pacific Islander
A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

1(e). Some other race
A person reported as not belonging to the following racial categories: White, Black or African American, Asian, American Indian or Alaskan Native, or Native Hawaiian or Other Pacific Islander.

1(f). Two or more races
A person belonging to two or more of the following racial categories: White, Black or African American, Asian, American Indian or Alaskan Native, Native Hawaiian or Other Pacific Islander, or Some Other Race.

2. Hispanic/Latino ethnicity origin populations
A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race. The U.S. Census Bureau identifies a minimum of two categories for ethnicity: “Hispanic or Latino” and “Not Hispanic or Latino.” Hispanic or Latino ethnic origin populations are considered an ethnic minority, rather than a racial minority. Persons who report themselves as Hispanic or Latino may be of any race and will report as such on the American Community Survey (ACS).

3. Limited-English Proficiency (LEP) populations
Any person age 5 or older who reported speaking English less than “very well” (meaning they reported that they spoke English “well”, “not well”, or “not at all”).

4. Elderly populations
Any person age 65 and over.

5. Young populations
Any person age 17 and under.

6. Populations with a disability
A noninstitutionalized civilian reported as having one or more of the following disabilities: Hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, or independent living difficulty.
7. Low-income households

Median household income for the Oklahoma City Metropolitan Statistical Area (MSA) is $52,825 (ACS 2016 5-year estimate). A household with income of less than 80% of the MSA median household income, $42,260, is considered to be low-income. Due to the data available, a household income of $39,999 or less was considered to be low-income.

8. Female-headed households with children under 18

Households including children (age 17 and under) headed by an unmarried female parent or guardian with no husband present.

9. Zero-vehicle households

Households in which a vehicle is not owned.

DATA ANALYSIS

The demographics data used for this environmental justice analysis and plan is American Community Survey (ACS) 2016 five-year estimates (2011-2016). This is the most current and complete data most suitable for this task at the time. Census block groups were chosen as the geography for the analyses in this plan with the exception of populations with a disability. For that environmental justice group, census tract was the most recent and reliable data to utilize. See Appendix II for a list of ACS tables used in the analyses in this plan.

The total population number and percentage of the total population was determined for each of the nine environmental justice groups. These percentages serve as the regional thresholds for the respective environmental justice populations. The table below gives a summary of the demographic data and environmental justice regional threshold percentages for the OCARTS area.
## OCARTS Area Environmental Justice Populations

<table>
<thead>
<tr>
<th>OCARTS AREA ENVIRONMENTAL JUSTICE POPULATIONS</th>
<th>POPULATION</th>
<th>PERCENT OF TOTAL POPULATION</th>
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<tbody>
<tr>
<td>Total Racial Minority populations</td>
<td>325,294</td>
<td>26.63%</td>
</tr>
<tr>
<td>Black/African American</td>
<td>131,392</td>
<td>10.76%</td>
</tr>
<tr>
<td>Asian</td>
<td>41,320</td>
<td>3.38%</td>
</tr>
<tr>
<td>American Indian/Alaskan Native</td>
<td>39,489</td>
<td>3.23%</td>
</tr>
<tr>
<td>Native Hawaiian/Pacific Islander</td>
<td>770</td>
<td>0.06%</td>
</tr>
<tr>
<td>Some other race</td>
<td>31,950</td>
<td>2.62%</td>
</tr>
<tr>
<td>Two or more races</td>
<td>80,373</td>
<td>6.58%</td>
</tr>
<tr>
<td>Hispanic populations</td>
<td>158,686</td>
<td>12.99%</td>
</tr>
<tr>
<td>LEP populations*</td>
<td>67,703</td>
<td>5.97%</td>
</tr>
<tr>
<td>Elderly populations (age 65 and older)</td>
<td>151,257</td>
<td>12.38%</td>
</tr>
<tr>
<td>Young populations (age 17 and under)</td>
<td>305,358</td>
<td>25%</td>
</tr>
<tr>
<td>Populations with a disability**</td>
<td>158,927</td>
<td>13.18%</td>
</tr>
<tr>
<td>Total OCARTS area population</td>
<td>1,221,498</td>
<td></td>
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</tbody>
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U.S. Census Bureau 2011 – 2016 ACS 5-year estimates

*Based on OCARTS area population age 5 and older: 1,133,235
**Based on OCARTS area population by census tract: 1,205,367

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<thead>
<tr>
<th>OCARTS AREA ENVIRONMENTAL JUSTICE HOUSEHOLDS</th>
<th>POPULATION</th>
<th>PERCENT OF TOTAL POPULATION</th>
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</thead>
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<tr>
<td>Low-income households</td>
<td>171,527</td>
<td>37.4%</td>
</tr>
<tr>
<td>Female-headed households with children</td>
<td>40,162</td>
<td>26.43%</td>
</tr>
<tr>
<td>Zero-vehicle households</td>
<td>24,896</td>
<td>5.43%</td>
</tr>
<tr>
<td>Total OCARTS area households with children</td>
<td>151,938</td>
<td>33.13%</td>
</tr>
<tr>
<td>Total OCARTS area households</td>
<td>458,603</td>
<td></td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2011 – 2016 ACS 5-year estimates
ENVIRONMENTAL JUSTICE COMMUNITIES OF CONCERN

Any census block group where the percentage of an environmental justice population is greater than the regional threshold percentage (environmental justice population percent of the total OCARTS area population) will be determined as being an environmental justice community of concern. See Appendix III for map results.

1. Racial Minority Populations

The regional threshold for all racial minority populations is 26.63%. The total racial minority population within the OCARTS area is 325,294 which makes up 26.63% of the region’s total population. The remaining 73.37% of the population is white. Any block group with a racial minority population of 26.63% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 173, or 18.48%, were deemed an environmental justice community of concern for racial minority.

1(a). Black or African American

The regional threshold for Black or African American populations is 10.76%. The total Black or African American population within the OCARTS area is 131,392 which makes up 10.76% of the region’s total population. Any block group with a Black or African American population of 10.76% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 310, or 33.12%, were deemed an environmental justice community of concern for this minority category.

1(b). Asian

The regional threshold for Asian populations is 3.38%. The total Asian population within the OCARTS area is 41,320 which makes up 3.38% of the region’s total population. Any block group with an Asian population of 3.38% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 237, or 25.32%, were deemed an environmental justice community of concern for this minority category.

1(c). American Indian or Alaskan Native

The regional threshold for American Indian or Alaskan Native populations is 3.23%. The total American Indian or Alaskan Native population within the OCARTS area is 39,489 which makes up 3.23% of the region’s total population. Any block group
with an American Indian or Alaskan Native population of 3.23% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 365, or 39%, were deemed an environmental justice community of concern for this minority category.

1(d). Native Hawaiian or other Pacific Islander

The regional threshold for Native Hawaiian or Other Pacific Islander populations is 0.06%. The total Native Hawaiian or Other Pacific Islander population within the OCARTS area is 770 which makes up 0.06% of the region’s total population. Any block group with a Native Hawaiian or Other Pacific Islander population of 0.06% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 40, or 4.27%, were deemed an environmental justice community of concern for this minority category.

1(e). Some other race

The regional threshold for Some other race populations is 2.62%. The total Some other race population within the OCARTS area is 31,950 which makes up 2.62% of the region’s total population. Any block group with a Some other race population of 2.62% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 245, or 26.18%, were deemed an environmental justice community of concern for this minority category.

1(f). Two or more races

The regional threshold for Two or More Race populations is 6.58%. The total Two or More Races population within the OCARTS area is 80,373 which makes up 6.58% of the region’s total population. Any block group with a Two or More Race population of 6.58% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 381, or 40.71%, were deemed an environmental justice community of concern for this minority category.

2. Hispanic/Latino ethnicity origin populations

The regional threshold for Hispanic or Latino origin populations is 12.99%. The total Hispanic or Latino origin population within the OCARTS area is 158,686 which is 12.99% of the region’s total population. Any block group with a Hispanic or Latino origin population of 12.99% or greater is considered a community of concern. Out of the 936
census block groups in the OCARTS area, 289, or 30.88%, were deemed an environmental justice community of concern for this minority category.

3. LEP populations

The regional threshold for LEP populations is 5.97%. The total LEP population within the OCARTS area is 67,703 which makes up 5.97% of the region’s total population. Any block group with a LEP population of 5.97% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 282, or 30.13%, were deemed an environmental justice community of concern for this minority category.

4. Elderly populations

The regional threshold for elderly populations is 12.38%. The total elderly population within the OCARTS area is 151,257 which makes up 12.38% of the region’s total population. Any block group with an elderly population of 12.38% or greater is considered to be a community of concern. Out of the 936 census block groups in the OCARTS area, 460, or 49.15%, were deemed an environmental justice community of concern for this minority category.

5. Young populations

The regional threshold for Young populations is 25%. The total population of children within the OCARTS area is 305,358 which makes up 25% of the region’s total population. Any block group with a population of children of 25% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 434, or 46.37%, were deemed an environmental justice community of concern for this minority category.

6. Populations with disability

The regional threshold for populations with a disability is 13.18%. The total population with a disability within the OCARTS area is 158,927 which makes up 13.18% of the region’s total population. Any census tract with a disability population of 13.18% or greater is considered a community of concern. Out of the 337 census tracts in the OCARTS area, 179, or 53.12%, were deemed an environmental justice community of concern for this minority category.
The preferred American Community Survey table for analysis of this population is B18101 “Sex by Age by Disability Status.” For the 2016 5-year estimate, table B18101 was not available at the block group level due to a high margin of error. Therefore, analysis of this population was done using table B18101 at the census tract level rather than block group.

7. **Low-income households**

The regional threshold for low-income households is 37.4%. The total number of low-income households within the OCARTS area is 171,527 which makes up 37.4% of the region’s total population. Any block group with a low-income population of 37.4% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 497, or 53.1%, were deemed an environmental justice community of concern for this minority category.

8. **Female-headed households with children under 18**

The regional threshold for female-headed households with children under 18 is 26.43%. The total number of female-headed households with children within the OCARTS area is 40,162 which makes up 26.43% of the total number of households with children in the region. Any block group with a female-headed household with children of 26.43% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 429, or 45.83%, were deemed an environmental justice community of concern for this minority category.

9. **Zero-vehicle households**

The regional threshold for zero-vehicle households is 5.43%. The total number of zero-vehicle households within the OCARTS area is 24,896 which makes up 5.43% of the total number of households in the region. Any block group with a Zero-vehicle household of 5.43% or greater is considered a community of concern. Out of the 936 census block groups in the OCARTS area, 348, or 37.18%, were deemed an environmental justice community of concern for this minority category.
OCARTS Area Minority Populations

<table>
<thead>
<tr>
<th>OCARTS AREA MINORITY POPULATIONS</th>
<th>BLOCK GROUPS</th>
<th>PERCENT OF TOTAL BLOCK GROUPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Racial Minority populations</td>
<td>173</td>
<td>18.48%</td>
</tr>
<tr>
<td>Black/African American</td>
<td>310</td>
<td>33.12%</td>
</tr>
<tr>
<td>Asian</td>
<td>237</td>
<td>25.32%</td>
</tr>
<tr>
<td>American Indian/Alaskan Native</td>
<td>365</td>
<td>39%</td>
</tr>
<tr>
<td>Native Hawaiian/Pacific Islander</td>
<td>40</td>
<td>4.27%</td>
</tr>
<tr>
<td>Some other race</td>
<td>245</td>
<td>26.18%</td>
</tr>
<tr>
<td>Two or more races</td>
<td>381</td>
<td>40.71%</td>
</tr>
<tr>
<td>Hispanic populations</td>
<td>289</td>
<td>30.88%</td>
</tr>
<tr>
<td>LEP populations</td>
<td>282</td>
<td>30.13%</td>
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<tr>
<td>Elderly populations</td>
<td>460</td>
<td>49.15%</td>
</tr>
<tr>
<td>Young populations</td>
<td>434</td>
<td>46.37%</td>
</tr>
<tr>
<td>Populations with a disability*</td>
<td>179</td>
<td>53.12%</td>
</tr>
<tr>
<td>Low-income households</td>
<td>497</td>
<td>53.10%</td>
</tr>
<tr>
<td>Female-headed households with children</td>
<td>429</td>
<td>45.83%</td>
</tr>
<tr>
<td>Zero-vehicle households</td>
<td>348</td>
<td>37.18%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2012 – 2016 ACS 5-year estimates
*Populations with a disability analyzed by census tract rather than block group

USING THE ENVIRONMENTAL JUSTICE PLAN

The goal of environmental justice and this plan is to ensure that low-income, minority, and other traditionally underserved populations will not be disproportionately or negatively affected by a given transportation plan or project. And conversely, environmental justice populations should have the same access to and receive the same benefits that non-environmental justice populations will receive from a transportation project. Therefore, ACOG will refer to this plan often during planning.

In planning, projects should take into consideration the potential burdens and the expected severity that nearby populations will experience. Some burdens of a transportation project may include:
• Increased traffic and increased travel time
• Decreased access to public transportation
• Decreased access to employment or businesses
• Negative air quality and/or water quality impacts
• Increased noise impacts
• Separating or bisecting minority and/or low-income communities
• Displacement or relocation of minority and low-income residents

It is also ACOG’s goal to ensure that transportation investments and their benefits are equally distributed amongst the people of Central Oklahoma. Some benefits of a transportation project may include:

• Decreased travel time
• Increased access to public transportation
• Increased access to pedestrian or bicycle facilities
• Increased access to employment or businesses
• Improved safety such as a reduction in the number of crashes
• Improved air quality

MPO PLANNING ACTIVITIES

In order to achieve environmental justice in regards to low-income, minority, and other traditionally underserved populations, the following steps should be taken in the analyses of a potential transportation project:

• Identify the potential benefits of the project
• Identify the potential burdens/adverse effects of the project
• Identify which environmental justice populations are present within the project area
• Identify the communities of concern block groups that are involved in the boundaries of the project
• Note possible mitigation strategies if the disproportionate effects cannot be avoided
• Use targeted public participation strategies throughout the process to keep those involved informed and engaged

As the region’s MPO, ACOG will utilize this environmental justice plan in evaluation of its major transportation planning activities, such as the MTP, TIP, and the annually prepared UPWP. Other MPO projects to be analyzed using this environmental justice plan include:

• Grant programs and criteria such as the Transportation Alternatives Program (TAP), Congestion Mitigation and Air Quality (CMAQ) grant programs, and the Surface Transportation Block Grant Program Funds (STBG-UZA)
• Bicycle, pedestrian, and trail projects and master plans
• Transit projects
• Safety plans and crash analysis reports
• Congestion Management Plans (CMP)

ACOG’s Public Participation Plan should be used to help identify tools and strategies to better reach environmental justice populations that could be affected by a transportation project. The PPP will aid in the identification of strategies and tools to be used to better reach environmental justice populations and communities identified in this environmental justice plan. For example, translated materials may be necessary to better inform racial minority and LEP populations about transportation projects and activities.

**INTERACTIVE WEBMAP**

In addition to the series of maps included in this environmental justice plan, ACOG has created an [interactive webmap](#) for environmental justice populations and communities of concern outlined in this plan. The webmap includes additional layers to be used for analysis such as current and future transportation investment project locations including street and highway improvements and bike/pedestrian projects. This webmap is available on ACOG’s website to be used to further aid in the transportation planning process.

**TITLE VI COMPLAINT PROCESS**

Any individual has a right to file a complaint against ACOG if they believe that the agency did not provide necessary services as appropriate. These complaints include those
available under Title VI of the Civil Rights Acts of 1964. The Title VI complaint forms are available on ACOG’s website at or by contacting the Title VI Coordinator. Appendix VI includes a copy of ACOG’s Title VI Complaint form.

CONCLUSION

This Environmental Justice Plan and associated maps will be updated every five years along with the MTP to incorporate new census data. At that time, regional threshold data will be updated and communities of concern will be re-evaluated. ACOG will continue to maintain this Environmental Justice Plan and update it when new information becomes available.

ACOG will continue to evaluate and incorporate the particular transportation needs of the environmental justice populations present in the region. For example, access to bus stops, schools, community and recreational centers, and safe pedestrian and bike facilities may need to be prioritized for young populations. Whereas elderly populations will have slightly different transportation priorities such as access to hospitals and convenient bus services such as paratransit. Racial minorities and populations with Limited English Proficiency may need more access to signage and plan materials in different languages. Increased access to transit will be important in areas of low-income populations and households that lack a vehicle.

ACOG will also continue to develop the list of potential benefits and burdens that may result from a transportation project as they relate to environmental justice populations. ACOG should also stay on top of legal developments and any new laws that might affect non-discrimination and environmental justice in transportation planning.
APPENDIX I

OKLAHOMA CITY AREA REGIONAL TRANSPORTATION STUDY AREA (OCARTS)
## AMERICAN COMMUNITY SURVEY TABLES USED (ACS)

<table>
<thead>
<tr>
<th>ENVIRONMENTAL JUSTICE POPULATION</th>
<th>ACS TABLE USED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Racial Minority populations</td>
<td>B02001 “Race”</td>
</tr>
<tr>
<td>Hispanic populations</td>
<td>B03003 “Hispanic or Latino Origin”</td>
</tr>
<tr>
<td>LEP populations</td>
<td>B16004 “Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over”</td>
</tr>
<tr>
<td>Elderly populations</td>
<td>B01001 “Sex by Age”</td>
</tr>
<tr>
<td>Young populations</td>
<td>B01001 “Sex by Age”</td>
</tr>
<tr>
<td>Populations with a disability</td>
<td>B18101 “Sex by Age by Disability Status”</td>
</tr>
</tbody>
</table>
| Low-income households                             | S1903 “Median Income in the Past 12 Months (in 2016 Inflation-Adjusted Dollars)” - Oklahoma City MSA  
B19001 “Household Income in the Past 12 Months (in 2016 Inflation-Adjusted Dollars)” |
| Female-headed households with children under 18   | B11005 “Households by Presence of People Under 18 Years by Household Type”     |
| Zero-vehicle households                           | B25044 “Tenure by Vehicles Available”                                          |
APPENDIX III

ENVIRONMENTAL JUSTICE MAPS

BLACK OR AFRICAN AMERICAN

LEGEND
- GREEN: GREATER THAN 10.76%
- GRAY: LESS THAN 10.76%

Miles

0 5 10 20
Environmental Justice Plan

POPULATIONS WITH A DISABILITY

LEGEND
- GREATER THAN 13.18%
- LESS THAN 13.18%

0 5 10 20 Miles

KINGFISHER
LOGAN
CANADIAN
OKLAHOMA
CLEVELAND
POTAWATOMIE
GRADY
MCLAIN
LINCOLN
Environmental Justice Plan

LOW-INCOME

LEGEND
- GREATER THAN 37.4%
- LESS THAN 37.4%

[Map showing low-income areas with counties marked.]
APPENDIX VI

TITLE VI COMPLAINT FORM

The Association of Central Oklahoma Governments is committed to ensuring that no persons are excluded from participation in, or denied the benefits of, its programs on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964. The complaint form must be filed within 180 calendar days from the date of the alleged discrimination.

DATE OF INCIDENT:
NAME:
ADDRESS:
CITY, STATE, ZIP:
PHONE NUMBER:
EMAIL ADDRESS:

INDICATE THE PERSON(S) WHO YOU BELIEVE DISCRIMINATED AGAINST YOU:

REASON(S) FOR DISCRIMINATION:
RACE
COLOR
NATIONAL ORIGIN
RELIGION
SEX
DISABILITY
OTHER

IF YOU HAVE AN ATTORNEY REPRESENTING YOU CONCERNING THE MATTERS RAISED IN THIS COMPLAINT, PLEASE PROVIDE THE FOLLOWING:
NAME:
ADDRESS:
PHONE NUMBER:
EMAIL ADDRESS:

YOU MAY SUCCESSFULLY FILE A COMPLAINT OR COMPLAIN TO ANY OTHER AGENCIES, INCIDENT ON THE BASIS OF TITLE VI.

DATE OF INCIDENT:

I DECLARE UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED IN THIS COMPLAINT IS TRUE TO THE BEST OF MY KNOWLEDGE.

SIGNATURE:
DATE:

COMPLAINT FORMS MUST BE SUBMITTED TO THE ASSOCIATION OF CENTRAL OKLAHOMA GOVERNMENTS. IF YOU REQUIRE ANY ASSISTANCE IN FILING OUT THE FORM, PLEASE CONTACT THE TITLE VI COORDINATOR AT THE ADDRESS BELOW.

Association of Central Oklahoma Governments
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