

APPENDIX E
ENVIRONMENTAL JUSTICE



Inner Loop North Transformation Project – Environmental Justice Demographic Analysis and Engagement Plan

December 2023

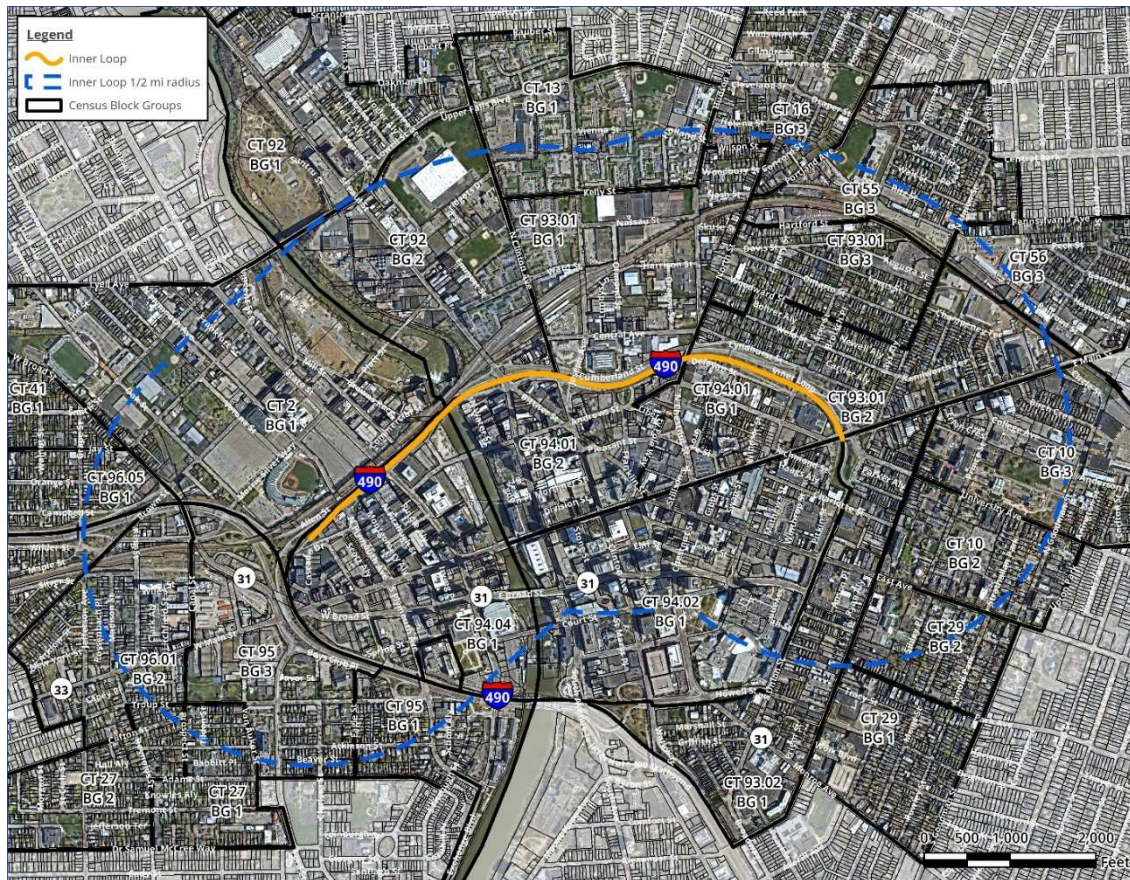
Introduction

In accordance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994), an Environmental Justice analysis of the Inner Loop North project area has been conducted to identify and address disproportionate and adverse effects of federally funded projects on the health or environment of minority populations, low-income populations, and other vulnerable populations (e.g. children, seniors, and those with disabilities) to the maximum extent practicable and permitted by law. In addition, this analysis was completed to ensure the City of Rochester’s compliance with Title VI of the Civil Rights Act of 1964.

Project Area

The study area identified for this analysis includes all block groups within a half-mile radius of the existing Inner Loop North highway. The boundary includes Upper Falls Blvd to the north, E. Main Street to the east, and Plymouth Avenue/I-490 to the west. There are 28 block groups identified within the Environmental Justice target area.

Figure 1 Study Area



Methodology

The Federal Highway Administration (FHWA) defines environmental justice populations as including [low-income and minority communities](#).¹ Specifically, three demographic measures determine if an area qualifies as an Environmental Justice area:

- **Minority Populations.** A minority community is a community where the minority population of the area exceeds 50% of the population, as defined by the Council on Environmental Quality (CEQ)'s Environmental Justice Guidance under the National Environmental Policy Act (December 1997), or exceeds the minority population percentage of the affected area. In Monroe County, 30% of the population is considered minority, therefore any Census block group in the study area in which the minority population exceeds 30% of the population is considered a minority population.² According to the FHWA's Guidance on Environmental Justice, minority populations can be defined as people who identify as Black or African American, Hispanic or Latino, Asian American, American Indian/Alaskan Native, and Native Hawaiian or Pacific Islander.

¹ [FHWA Order 6640.23A](https://www.fhwa.dot.gov/legisregs/directives/orders/664023a.cfm) <https://www.fhwa.dot.gov/legisregs/directives/orders/664023a.cfm>

² [Promising Practices for EJ Methodologies in NEPA Reviews: Report of the Federal Interagency Working Group on Environmental Justice & NEPA Committee, 2016](https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf) (https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf)



- **Low-Income Populations.** FHWA defines low-income individuals as having household incomes at or below the Department of Health and Human Services poverty guidelines. This analysis uses the U.S. Census Bureau's poverty thresholds. In Rochester, 28% of the population falls under the Census poverty level. Therefore, any block group exceeding that poverty rate is considered a low-income community.
- **Limited English Proficiency (LEP).** Title VI of the Civil Rights Act prohibits discrimination based on race, color, or national origin in federally funded programs. This requires federal assistance recipients to ensure accessibility for eligible persons with limited English proficiency. For this analysis, an LEP community consists of 5% or 1,000 (whichever is less) of a population speaking a language other than English, per US Department of Transportation Safe Harbor guidance.³

Data Sources

All data used for this analysis was derived from the [US Environmental Protection Agency EJ Screen](#), which uses U.S. Census Bureau's American Community Survey (ACS) 5-year estimates. Data tables in this memo are based on ACS 5-year estimates from 2022. Additional data tables related to these demographic categories can be [found here](#).

³ Federal Register Volume 70, Number 239, *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons*, 2005

Minority Communities

Of the 28 block groups within the demographic study area, 23 or 82% are classified as minority communities. The block group with the highest percentage of minority residents is Census Tract 27 Block Group 2 at 99%.

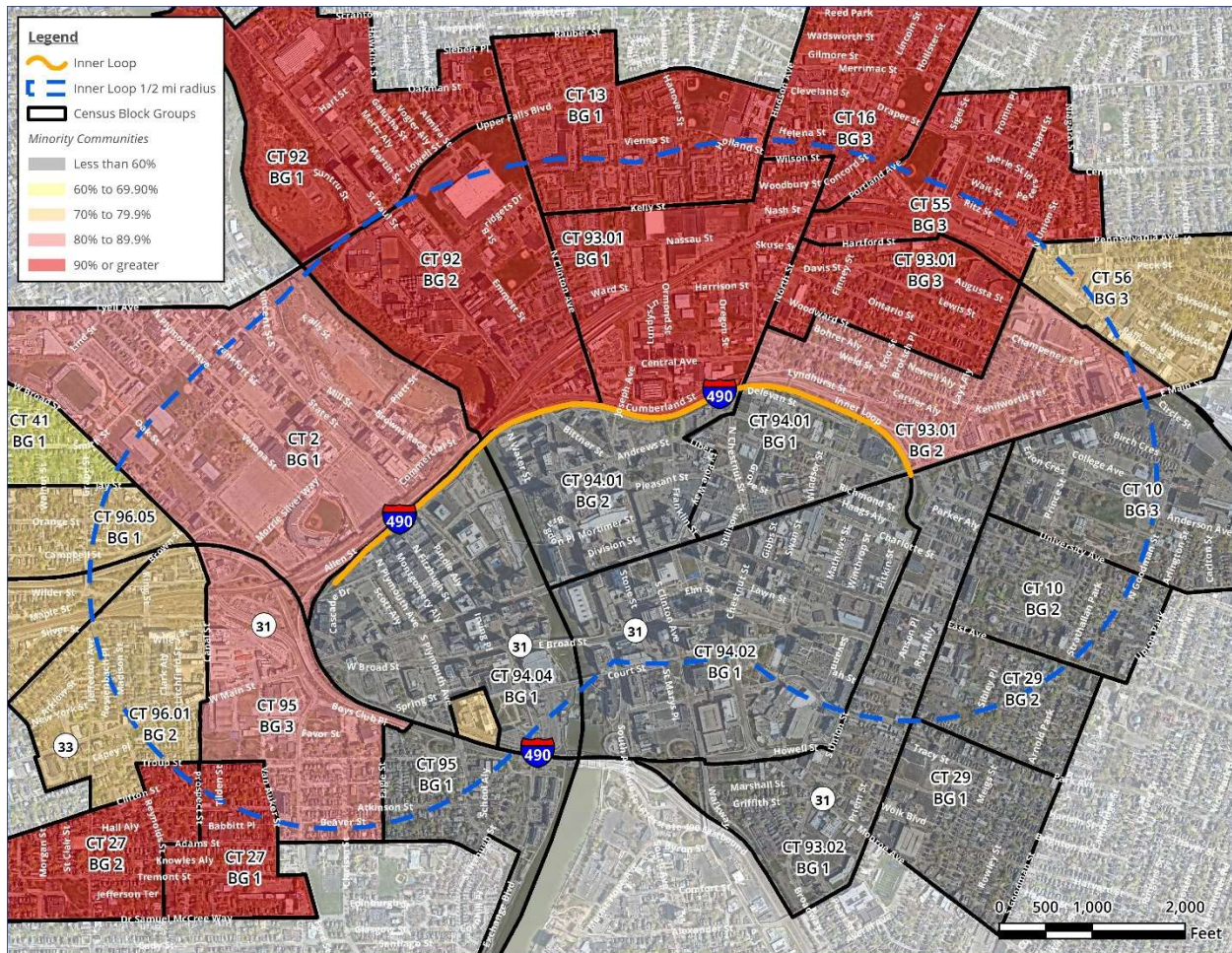
The census tract with the lowest percentage minority population is Census Tract 29 Block Group 2 at 9%. The block groups with less than 50% minority population are all generally located south or east of the Inner Loop expressway, with the Inner Loop representing a clear divide in the demographic composition of neighborhood areas.

Figure 2 Minority Communities

Census Tract	Block Group	Population	Households	% Minority
2	1	572	314	84%
10	2	930	648	35%
10	3	971	668	40%
13	1	1,979	511	98%
16	3	651	316	93%
27	1	606	190	97%
27	2	714	376	99%
29	1	1,092	569	27%
29	2	718	482	9%
41	1	705	207	67%
55	3	449	168	92%
56	3	529	281	71%
92	1	481	293	96%
92	2	589	257	95%
93.01	1	921	359	98%
93.01	2	684	337	83%
93.01	3	514	210	93%
93.02	1	2,116	1,289	27%
94.01	1	537	204	32%
94.01	2	1,559	1,071	39%
94.02	1	1,600	1,241	26%
94.03	1	987	0	76%
94.04	1	295	152	32%
95	1	1,055	619	21%
95	3	1,038	384	86%
96.01	2	968	512	70%
96.02	1	877	297	77%
96.05	1	1,244	410	70%

Source: US Census Bureau ACS 5-year estimates (2022)

Figure 3 Minority Communities Map



Source: US Census Bureau ACS 5-year estimates (2022)

Low-Income Communities

Of the 28 block groups within the study area, 89% are classified as low-income communities. The majority of these block groups align with the block groups identified as minority communities, emphasizing the importance of addressing and mitigating any adverse impacts of the project in these communities.

Figure 4 Low-Income Communities

Census Tract	Block Group	Population	Households	Low Income Households
2	1	572	314	73%
10	2	930	648	34%
10	3	971	668	51%
13	1	1,979	511	53%
16	3	651	316	66%
27	1	606	190	74%
27	2	714	376	74%
29	1	1,092	569	41%
29	2	718	482	16%
41	1	705	207	88%
55	3	449	168	45%
56	3	529	281	53%
92	1	481	293	93%
92	2	589	257	81%
93.01	1	921	359	99%
93.01	2	684	337	69%
93.01	3	514	210	82%
93.02	1	2,116	1,289	43%
94.01	1	537	204	47%
94.01	2	1,559	1,071	61%
94.02	1	1,600	1,241	20%
94.03	1	987	0	-
94.04	1	295	152	33%
95	1	1,055	619	35%
95	3	1,038	384	85%
96.01	2	968	512	52%
96.02	1	877	297	70%
96.05	1	1,244	410	69%

Source: US Census Bureau ACS 5-year estimates (2022)

Limited English Proficiency (LEP) Communities

Of the 28 block groups within the demographic study area, 16 are classified as LEP communities. To be considered an LEP community, 5% or more of the population must be classified as limited-English speaking.

The block group with the highest percentage of residents identified as speaking English less than very well is Census Tract 92 at 38%. The census tracts with higher percentages of residents identified as speaking English less than very well are located north of the Inner Loop. Spanish followed by other Indo-European languages are common in these census tracts.

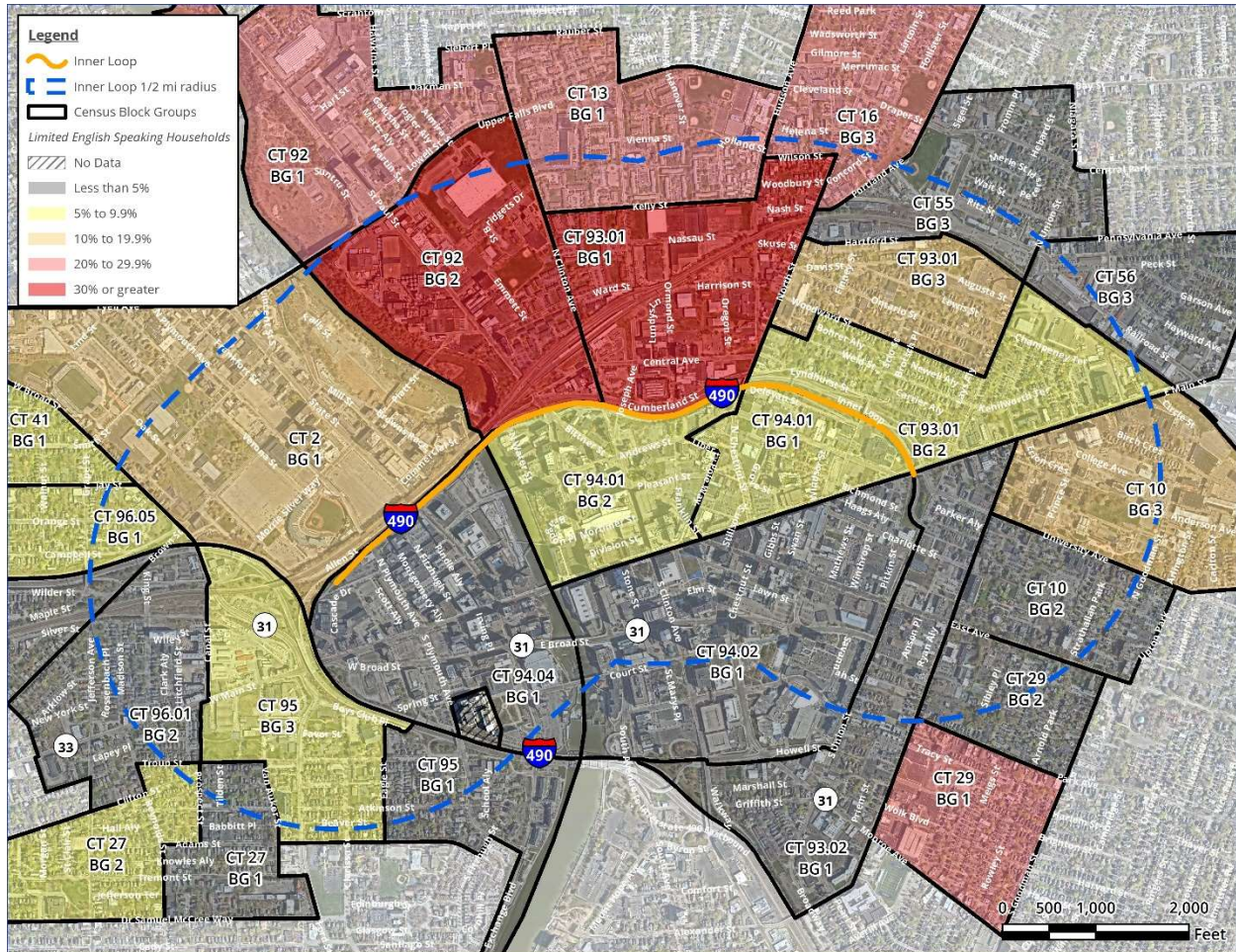
Figure 6 Limited English Proficiency Communities

Census Tract	Block Group	Population	Households	Limited English-Speaking Households
2	1	572	314	10%
10	2	930	648	0%
10	3	971	668	15%
13	1	1,979	511	28%
16	3	651	316	24%
27	1	606	190	0%
27	2	714	376	5%
29	1	1,092	569	24%
29	2	718	482	0%
41	1	705	207	7%
55	3	449	168	2%
56	3	529	281	3%
92	1	481	293	29%
92	2	589	257	38%
93.01	1	921	359	32%
93.01	2	684	337	8%
93.01	3	514	210	13%
93.02	1	2,116	1,289	2%
94.01	1	537	204	6%
94.01	2	1,559	1,071	6%
94.02	1	1,600	1,241	3%
94.03	1	987	0	-
94.04	1	295	152	0%
95	1	1,055	619	2%
95	3	1,038	384	8%
96.01	2	968	512	3%
96.02	1	877	297	4%
96.05	1	1,244	410	5%

Source: US Census Bureau ACS 5-year estimates (2022)

Note: The Limited English Proficiency (LEP) category represents households in with no member 14 years or older either speaks only English or speaks a non-English language and speaks English “very well.”

Figure 7 Low English Proficiency Communities Map



Source: US Census Bureau ACS 5-year estimates (2022)

Environmental Justice Communities

The following table shows the Block Groups that fall within each of the metrics that indicate Environmental Justice populations. 25 of the 28 block groups fall within at least one of the EJ metrics. Any adverse impacts of the project should be carefully considered given the density of vulnerable populations within the vicinity of the Inner Loop North project area.

Figure 8 Environmental Justice Communities Summary

Census Tract	Block Group	% Minority	Low Income Households	Limited English-Speaking Households
2	1	X	X	X
10	2	X	X	
10	3	X	X	X
13	1	X	X	X
16	3	X	X	X
27	1	X	X	
27	2	X	X	X
29	1		X	X
29	2			
41	1	X	X	X
55	3	X	X	
56	3	X	X	
92	1	X	X	X
92	2	X	X	X
93.01	1	X	X	X
93.01	2	X	X	X
93.01	3	X	X	X
93.02	1		X	
94.01	1	X	X	X
94.01	2	X	X	X
94.02	1			
94.03	1	-	-	-
94.04	1	X	X	
95	1		X	
95	3	X	X	X
96.01	2	X	X	
96.02	1	X	X	
96.05	1	X	X	X

Supplemental Tables

The following table shows additional demographic data, such as the percentage of the population under five years and over 65 years of age, persons with disabilities, and population without broadband access. This data will help inform public engagement decisions, such as providing childcare at public meetings, meeting locations and times, survey and feedback format (digital vs. paper), etc.

Figure 9 Supplemental EJ Data

Census Tract	Block Group	% Population Under 5	Population Aged 65+	Persons with Disabilities	Service Gaps:
					Broadband Access
2	1	16%	0%	10%	34%
10	2	0%	42%	12.1%	11%
10	3	0%	2%	12.1%	5%
13	1	17%	10%	23.3%	27%
16	3	12%	16%	26.7%	54%
27	1	5%	9%	26.6%	29%
27	2	3%	13%	26.6%	18%
29	1	2%	12%	10.6%	0%
29	2	0%	17%	10.6%	0%
41	1	11%	6%	23.4%	13%
55	3	5%	7%	18%	18%
56	3	2%	4%	14.5%	14%
92	1	6%	36%	26.7%	60%
92	2	3%	12%	26.7%	21%
93.01	1	4%	17%	23.6%	33%
93.01	2	2%	14%	23.6%	33%
93.01	3	7%	5%	23.6%	8%
93.02	1	2%	8%	10.5%	9%
94.01	1	0%	13%	24%	0%
94.01	2	0%	14%	24%	34%
94.02	1	0%	7%	13%	32%
94.03	1	-	-	-	-
94.04	1	0%	2%	14%	0%
95	1	5%	14%	19.6%	4%
95	3	15%	6%	19.6%	22%
96.01	2	4%	6%	31.6%	24%
96.02	1	9%	9%	16.9%	28%
96.05	1	19%	4%	23.2%	42%

Source: Persons with Disabilities: 2021 ACS "Sex by Age by Disability Status" table (B18101) for Census tracts. "Block group values are calculated by multiplying the tract value by the block population weight. The weights are derived from the same Census source used by the EJScreen buffer reports and analysis."



Broadband Gaps: 2021 ACS "Presence and Types of Internet Subscriptions in Household" table (B28002).
Age breakdowns: U.S. Census Bureau, American Community Survey (ACS) 2017 -2021

Environmental Justice Community Outreach

The City of Rochester is committed to transparent and extensive engagement with the impacted neighborhoods. The extensive outreach that occurred during the Planning phase of the Inner Loop North project will continue through the duration of the Design phase, with a priority on soliciting input and feedback from Environmental Justice communities. Engagement will provide the community with meaningful opportunities for dialogue, questions, and comments. Best practices for engaging with Environmental Justice communities include offering multiple public workshop options at different times, locations, and formats (i.e. in-person and virtual), providing materials languages other than English, and providing activities and/or childcare at engagement events. These engagement opportunities will be in alignment with Executive Order (EO) 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations and other recent EOs on environmental justice.

Several methods of outreach that will be utilized to engage traditionally under-represented communities are outlined below:

Stakeholder Meetings

Stakeholders are groups or individuals who are interested in and/or potentially impacted by the outcome of a transportation decision and can provide specific insights into the community concerns. The project team will meet with a variety of key stakeholder groups to ensure a broad range of community members receive the opportunity to provide feedback and identify project concerns. Stakeholder engagement will benefit the project in two ways: 1) allow for stakeholders to provide direct feedback and input on project development and 2) provide the project team with direction and suggestions for how to incorporate additional community engagement approaches targeting EJ population groups. Stakeholder engagement will be conducted during the early phases of the project and will continue on an as-needed basis over the course of the project.

Initial stakeholder groups within the EJ communities identified for outreach include but are not limited to:

- Low-Income Housing Residents
 - F.I.G.H.T. Village Apartments
 - St. Simon's Terrace
 - Andrews Terrace
 - YWCA
 - Liberty Landing
 - New2U Homes (High Falls)
 - Charlotte Square on the Loop
 - Landmark at Sibley Square
- Organizations
 - Hinge Neighbors
 - Center for Disability Rights
 - Urban League of Rochester
 - Ibero American Action League
 - House of Mercy

- Open Door Mission
- Catholic Family Charities
- Neighborhood Service Centers
 - Northeast Neighborhood Service Center
 - Northwest Neighborhood Service Center
 - Southwest Neighborhood Service Center
 - Southeast Neighborhood Service Center
- Youth Engagement
 - R-Centers / Community Centers
 - Trenton and Pamela Jackson R-Center (N. Clinton Ave)
 - Adams Street R-Center (Adams St.)
 - David F. Gantt R-Center (North St.)
 - Clinton Baden Community Center
 - Schools
 - World of Inquiry School No. 58
 - Rochester Prep High School
 - John Williams School No. 5
 - Nathaniel Hawthorne School No. 25
 - Abraham Lincoln School No. 22
 - Dr. Martin Luther King Jr. School No. 9
 - Lewis Street Center for Equity

- **Public Events.**

Public Meetings/Workshops will be held throughout the duration of the Project as formal information sessions and to provide opportunities for input, comments, and feedback. All public events and workshops will be located within or near the identified EJ communities to provide easy access to community members. Meeting locations will be selected based on specific criteria to ensure ease of access - located on an RTS bus service, readily available parking, and ADA accessible. When feasible, meetings will be offered at various times of day and days of the week to accommodate various schedules. Meeting content will also be made available in an online format for those unable to attend in person. Activities for children will also be provided in the event childcare is not available and impacts a persons' ability to participate.

Recognizing the large Spanish-speaking population within the EJ area, all promotional materials for meetings will be provided in both English and Spanish. Meeting materials, to the extent practicable, will also be provided in both English and Spanish. The project team may also run a radio spot on PODER 97.1 FM, Rochester's 24-hour Latin radio station, to advertise upcoming meetings and ensure information is reaching a broad audience. Public workshop flyers will be distributed door-to-door and/or through mailings within EJ census tracts in both English and Spanish. Translations in additional languages such as French, Vietnamese, Russian, Arabic, Mandarin, Cantonese, Korean, German, Tagalog, can be arranged upon request. A notice about translation can be displayed at public events and on the project website.

Spanish and ASL interpreters will be available at all public events.



Specific dates, times and locations for public workshops and events are undetermined at this time.

- **Pop-Up Events.**

Multiple pop-up engagement events are anticipated to occur throughout the Inner Loop North Transformation Project design phase. Pop-up events provide informal opportunities for residents to learn more about the project, ask questions, and provide feedback. Pop-up events will happen at existing community events with a goal of soliciting feedback from a wide variety of community stakeholders and residents, with an emphasis on EJ communities. Pop-events may include but are not limited to:

- Rochester Public Market
- Puerto Rican Festival
- Rochester Summer Soul Festival
- Tops Friendly Markets pop-up
- Other locations TBD

- **Project Website.**

The project website (www.innerloopnorth.com) will continue to serve as a public engagement platform throughout the design phase. The website, originally developed during the planning phase, includes background information on the project, public engagement opportunities, and a comments page that allows community members to share feedback.

The website is mobile friendly and provides the opportunity for community members to access project information 24/7. It is also available to be reviewed in multiple languages.