

## CHAPTER 3: **Title VI AND Environmental Justice**

As the region's MPO, DVRPC is mandated to ensure nondiscrimination in all of its programs and projects, including the TIP, and respond to federal guidance on Environmental Justice. There are two primary federal non-discrimination guidelines DVRPC follows in its planning efforts: Title VI of the Civil Rights Act of 1964 and the 1994 President's Executive Order on Environmental Justice (EJ) (#12898). At the time of writing this TIP document, there is no published guidance for MPOs related to Executive Order 14008: Tackling the Climate Crisis at Home and Abroad nor for the Justice40 Initiative, which aims to deliver 40 percent of the overall benefits of federal investments in climate and clean energy, including sustainable transportation, to disadvantaged communities. However, DVRPC is using USDOT's Equity Action Plan and related equity mapping tools such as the Equitable Transportation Community (ETC) Explorer, Area of Persistent Poverty (AoPP) & Historically Disadvantaged Communities (HDC) tool, and Climate and Economic Justice Screening Tool (CEJST) to inform the TIP process. DVRPC is prepared to incorporate this executive order into the TIP process once implementation guidance is formalized. There was recent guidance from PennDOT for the Commonwealth of Pennsylvania referred to as the "South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide" that DVRPC first followed for the update of the FY2021 TIP for Pennsylvania. DVRPC has followed this guidance as a best practice for the FY2024 TIP for New Jersey, since similar guidance has yet to be issued specifically for New Jersey.

The programming process that DVRPC facilitates during TIP updates is dynamic and complex. The process seeks to meaningfully address diverse needs and requirements in addition to Title VI and EJ considerations, and to ensure these requirements and considerations influence how the region's resources are allocated. In addition to Title VI and EJ, some other considerations in TIP programming include:

- ensuring consistency with DVRPC's Long-Range Plan vision, goals, and objectives;
- distributing resources to different geographic areas;
- supporting federal performance-based planning and programming measures;
- balancing competing transportation modes (transit, bicycle, pedestrian, freight, road);
- satisfying eligibility requirements of various funding sources (e.g., HSIP versus CMAQ); and
- staying within the constraints of the level of transportation funding that the region expects to receive.

### 3.1 What Are Title VI and EJ?

Title VI and EJ are required components in the metropolitan planning process due to legislative and executive actions: Title VI of the Civil Rights Act of 1964, the President's Executive Order #12898 from 1994, and the USDOT Order on Environmental Justice in Minority Populations and Low-Income Populations 5610.2(a).

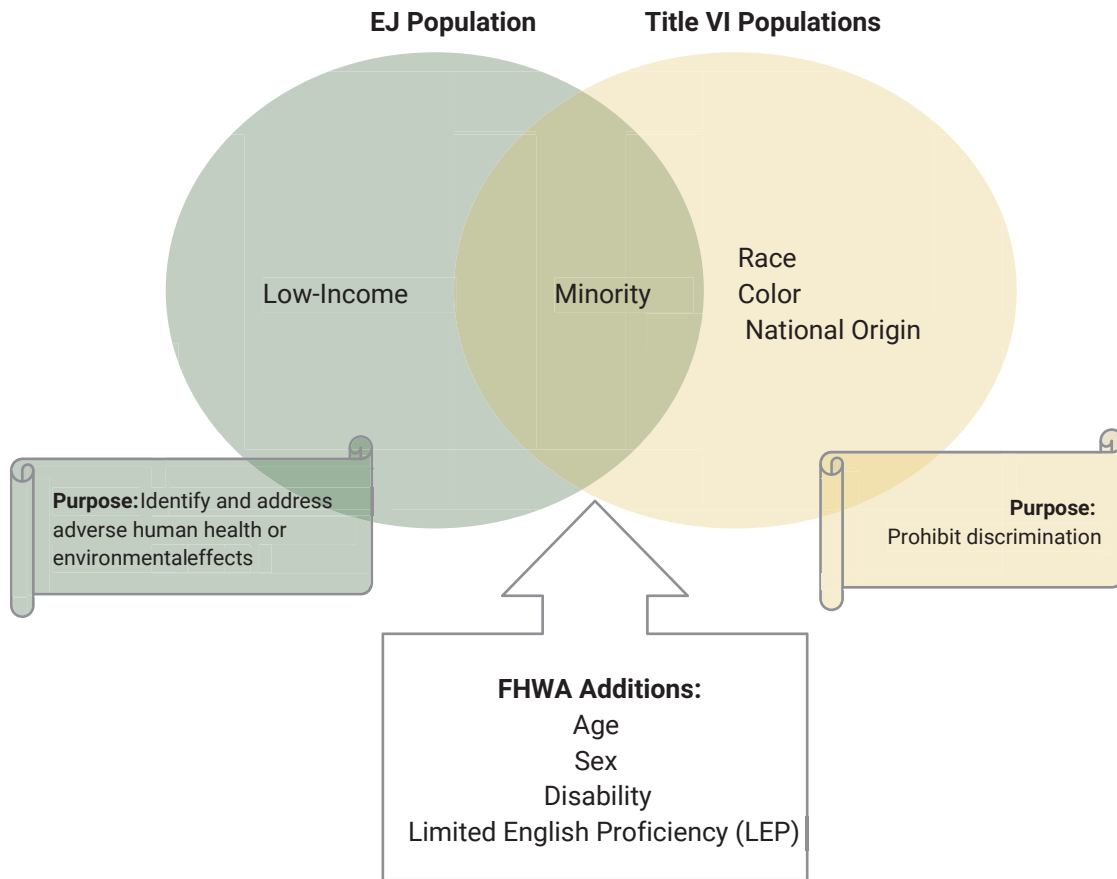
Title VI of the Civil Rights Act of 1964, which served as the foundation for the EJ Executive Order, is a nondiscrimination statute that states "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Additional guidance

from FTA and the FHWA encourage transportation agencies to follow non-discrimination guidelines based on sex, age, and disability.

The 1994 President's Executive Order #12898 on Environmental Justice ensures that each agency receiving federal financial assistance will make EJ its mission "by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States." Upholding the principle of environmental justice in transportation means that projects, such as highway expansions, do not have a disproportionately negative impact on communities that have historically been isolated from and disregarded in the planning process.

In the transportation realm, the USDOT Order on Environmental Justice in Minority Populations and Low Income Populations 5610.2(a) requires that transportation agencies fully consider environmental justice principles throughout planning and decision-making processes in the development of programs, policies, and activities. See Figure 3 for the overlap in populations and intent of Title VI and EJ. All transportation agencies must strive to offer the opportunity for people to be meaningfully involved in the development of transportation plans; all persons shall experience an equitable distribution of benefits and costs from transportation projects, programs, and policies; a person or population group should not be denied the benefits of the TIP; and agencies should avoid, minimize, or mitigate disproportionate burdens (high and adverse impacts) resulting from a program or project, especially for minority and low-income populations.

**Figure 3:** Populations and Purpose of EJ and Title VI



Source: DVRPC, 2023

DVRPC is committed to responding to the federal guidance on Title VI and EJ with additional guidance and feedback from federal, state, and regional partners. DVRPC's Regional Planning division, which includes the Office of Capital Programs, works with the Office of Communications and Engagement to address technical and public involvement activities, respectively, as they relate to Title VI and EJ. To meet the requirements of the federal guidance, DVRPC has and will continue to conduct the following activities:

- Enhance its analytical capabilities to ensure that the Long-Range Plan and the TIP comply with Title VI.
- Identify residential, employment, and transportation patterns of low-income and minority populations, so that their needs can be identified and addressed, and the benefits and burdens of transportation can be fairly distributed.
- Evaluate and, where necessary, improve the public outreach process to eliminate barriers and engage minority and low-income populations in regional decision-making.

DVRPC's technical work involves the evaluation of Title VI and EJ issues through quantitative and qualitative analyses and mapping. In 2001, DVRPC developed a technical assessment to identify populations of concern that may be directly and disparately impacted by the Commission's plans, programs, and planning processes. This assessment, called Indicators of Potential Disadvantage, was significantly revised in 2010 and 2018. The IPD analysis is utilized in a variety of DVRPC plans and programs, including the TIP, and is available online at [www.dvrpc.org/webmaps/IPD](http://www.dvrpc.org/webmaps/IPD). For more information about DVRPC's Title VI Compliance Program and Public Involvement opportunities, please visit [www.dvrpc.org/GetInvolved/TitleVI](http://www.dvrpc.org/GetInvolved/TitleVI) and [www.dvrpc.org/GetInvolved/PublicParticipation](http://www.dvrpc.org/GetInvolved/PublicParticipation).

DVRPC recognizes that transportation infrastructure investments form the backbone of a healthy and prosperous region, but their impacts may involve changes to traveler costs, accessibility, community cohesion, air quality, noise, visual quality, and other factors that can affect one community more than another and at different times of the project process (before, during, and after construction). Hence, Title VI and EJ are vital components of developing and evaluating the TIP.

## 3.2 Program Evaluation

In this FY2024 NJ TIP update, DVRPC performed an Environmental Justice and Equity analysis based on guidance from PennDOT for the Commonwealth of Pennsylvania referred to as the "South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide." This guide outlines strategies to accomplish the "core elements" (as described by the guidance) of an environmental justice analysis. The core elements that the guide prescribes are:

1. Identify environmental justice populations (Low Income, Racial Minority, and Ethnic Minority).
2. Assess conditions and identify needs.
3. Evaluate burdens and benefits.
4. Identify and address potential disproportionate and adverse impacts, which will inform future planning efforts.

## Step 1: Identify Populations (Low Income, Racial Minority, and Ethnic Minority)

Table 10 provides an overview of demographic data from the U.S. Census Bureau for the four New Jersey region counties of Burlington, Camden, Gloucester, and Mercer counties. This includes information on the populations of minority and low-income populations, and other historically and currently disenfranchised populations, such as people with disabilities.

**Table 10:** Population Estimates in the DVRPC New Jersey Region

POPULATION GROUP	TOTAL ESTIMATES	PERCENTAGE OF REGIONAL TOTAL
<b>Total</b>	<b>1,667,068</b>	<b>100%</b>
<b>White, Non-Hispanic</b>	<b>1,094,733</b>	<b>66%</b>
<b>Minority</b>	<b>660,099</b>	<b>39%</b>
Black or African American, Non-Hispanic	284,937	17%
Hispanic	223,201	13%
Asian, Non-Hispanic	109,607	7%
Two or more races, Non-Hispanic	90,378	5%
<b>Other Communities of Concern:</b>		
Female	850,046	51%
Older Adults (65 years or older)	266,445	16%
Limited English Proficiency (LEP)	116,752	7%
Foreign Born	214,165	13%
Persons with a Disability	198,989	12%

Source: American Community Survey 5-Year Estimates, U.S. Census Bureau, 2017-2021

White, Non-Hispanic persons account for two-thirds of the DVRPC New Jersey region’s population (at 66 percent), followed by Black or African American - Non-Hispanic (at 17 percent), Hispanic (at 13 percent), and Asian alone - Non-Hispanic (at 7 percent). Maps depicting concentrations of low-income and minority populations are included in Appendix G: Environmental Justice Appendix.

## Step 2: Assess Conditions and Identify Needs

The Pennsylvania guide highlights the importance of informing planning partners of existing asset conditions before and after projects are selected for the TIP/STIP. During the TIP development process, DVRPC shared maps displaying bridge and pavement asset conditions along with demographic information that included EJ and Title VI populations with the New Jersey Subcommittee of the Regional Technical Committee (often referred to as the NJ TIP Subcommittee as mentioned in Chapter 1). This data informed a conversation among stakeholders about how to maintain and improve the region’s transportation network equitably, avoiding disproportionate impacts or levels of investment. Appendix G contains various maps that illustrate mappable highway and transit projects in the TIP along with concentrations of low-income and racial and ethnic minority populations.

### Bridge Conditions in Communities of Concern

Analysis of bridge conditions found that bridges in poor condition are not disproportionately located in communities with average, above-average, or well-above-average concentrations of either low-income or minority populations.

### Pavement Conditions in Communities of Concern

Analysis of pavement conditions found that poor pavement condition is not disproportionately located in communities with average, above-average, or well-above-average concentrations of either low-income or minority populations.

Assessing conditions is important for Performance-Based Planning and Programming (PBPP; detailed in Chapter 4). MAP-21 and the subsequent FAST Act and IIJA require state DOTs and MPOs to use the PBPP approach in transportation decision making. This includes establishing baseline performance metrics for the transportation network, setting data-driven targets, selecting projects to help meet those targets, and tracking progress. The goal of PBPP is to ensure targeted investment of transportation funds by increasing accountability and transparency and providing for better investment decisions that focus on outcomes related to goals including safety, infrastructure preservation, congestion reduction, and system reliability.

### Transit Access

To understand access to transit, DVRPC uses mapping developed in the Equity Through Access (ETA) project, which is used in the region's Coordinated Human Services Transportation Plan (CHSTP). The ETA transit accessibility map layer shows a composite measure of regional public transit accessibility, considering how many areas a person could access in a 45-minute transit trip, the general number of essential services accessible in a 45-minute transit trip, frequency of service, and walkability of the block group to transit stations/stops. Using accessibility data at the block group level, the four characteristics were combined and ranked 1 through 10. Higher values were assigned to areas that are less accessible by transit and lower values were assigned to areas that are more accessible by transit. A map showing transit accessibility in the New Jersey portion of the DVRPC region is included in Appendix G.

## Step 3: Evaluate Burdens and Benefits

The remaining core elements from the "South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide" are to evaluate burdens and benefits and to identify and address potential disproportionate and adverse impacts, which will inform future planning efforts as part of TIP equity analysis. DVRPC conducted this part of the analysis in three ways to understand if investments are potentially impacting protected population groups and/or communities of concern:

- program evaluation by project mapping;
- program evaluation of the allocation of investments; and
- review by project type.

### Program Evaluation by Project Mapping

Although a number of projects were excluded from the analysis due to their inability to be geographically represented, the FTA and FHWA recommends utilizing geographic information systems (GIS) in equity analyses for identifying potential impact to communities of concern. A 50-foot buffer was applied to the mapped features (points and lines) to capture potentially impacted census tracts.

DVRPC also evaluated each project during the project selection process by using the TIP-LRP Benefit Evaluation Criteria and designated an IPD score (discussed in further detail below). Note that all new projects that appear on the TIP for the first time were part of this evaluation. After TIP projects were selected, the entire program of investments that can be mapped (“mappable”) was evaluated by census tract using the IPD analysis. Not all TIP projects can be mapped (“unmappable”) due to the scale and nature of the improvement (e.g., DB #D1601, New Jersey Regional Signal Retiming Initiative). There are 189 TIP projects in the Highway and Transit Programs that are not mappable and/or lack statistically significant residential census data. The list of unmappable projects is found in Appendix G.

#### Program Evaluation of the Allocation of Investments

Both the TIP project selection process and overall program evaluation rely on DVRPC’s Indicators of Potential Disadvantage (IPD) to analyze projects that can be mapped. There are nine population groups that are currently analyzed via the IPD, all of which have been identified as communities of concern under Title VI and/or EJ:

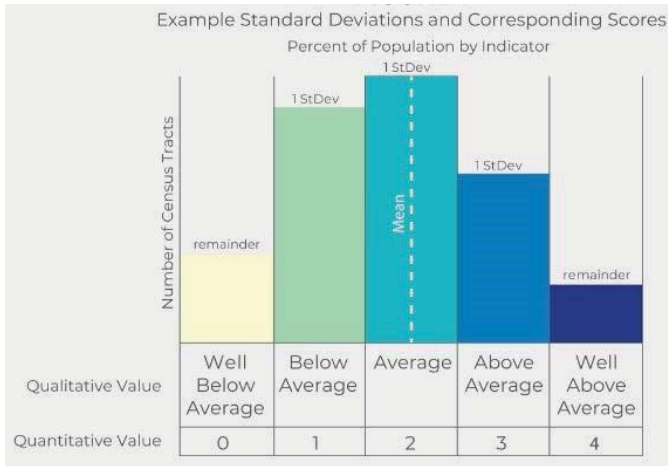
- |                    |                              |                                |
|--------------------|------------------------------|--------------------------------|
| 1. Youth           | 5. Ethnic Minority           | 8. Limited English Proficiency |
| 2. Older Adults    | 6. Foreign Born              | 9. Low-Income                  |
| 3. Female          | 7. Persons with Disabilities |                                |
| 4. Racial Minority |                              |                                |

The IPD methodology evaluates each census tract in the region for the concentration of each of the nine IPD population groups listed above using American Communities Survey (ACS) data. This methodology is used in the TIP to understand the distribution of projects and how they may potentially benefit or burden communities of concern, particularly focusing on the low-income, racial minority, and ethnic minority populations.

In the IPD methodology, the data for each of the indicators in the IPD analysis is split into five categories, which are determined by using the regional average to create standard deviations for each indicator. A score is correlated with each of the five categories to create a system for comparing the concentrations of populations within TIP project areas. As Figure 4 illustrates, a census tract “cumulative score” (a composite IPD score ranging from 0 to 36) is determined by each of the indicator’s individual scores (0 to 4):

- Well below average (score of 0)
- Below average (score of 1)
- Average (score of 2)
- Above average (score of 3)
- Well above average (score of 4)

**Figure 4: IPD Scoring Methodology**



Source: DVRPC, 2023

These summary scores are then again organized into five categories from “well below average” to “well above average,” to allow for regional comparisons and evaluation:

- Well below average (scores from 0 to 11)
- Below average (scores from 12 to 16)
- Average (score of 17-20)
- Above average (scores from 21 to 24)
- Well above average (scores from 25 to 36)

Please visit [www.dvrpc.org/webmaps/ipd/](http://www.dvrpc.org/webmaps/ipd/) for further details about the IPD.

Table 11 illustrates 66 total mappable projects with funding totaling slightly more than \$2.176 billion over a 10-year period (FY24–FY33) of the DVRPC FY2024 TIP for New Jersey. The mappable projects are organized by individual indicator scores for the Ethnic Minority, Low Income, and Racial Minority indicators and related costs to understand the distribution of projects by populations present. The majority of funds are programmed for projects located in areas with average, above average, and well above average concentrations of Ethnic Minority, Low Income, and Racial Minority populations.



**Table 11:** Economic Investment in Communities of Concern by Individual Indicator

Indicator and Score	# of projects	Total 10-year cost (in millions)	Percentage of investment (mappable projects only)
<b>Ethnic Minority</b>			
Well below average (score = 0)	0	\$0	0%
Below average (score = 1)	0	\$0	0%
Average (score = 2)	39	\$1,430.5	51%
Above average (score = 3)	12	\$204.9	25%
Well above average (score = 4)	15	\$541.3	24%
<b>Low-income</b>			
Well below average (score = 0)	0	\$0	0%
Below average (score = 1)	15	\$558.5	26%
Average (score = 2)	22	\$523.5	19%
Above average (score = 3)	15	\$562.8	32%
Well above average (score = 4)	14	\$531.9	23%
<b>Racial Minority</b>			
Well below average (score = 0)	0	\$0	0%
Below average (score = 1)	14	\$291	13%
Average (score = 2)	26	\$1,140.5	52%
Above average (score = 3)	10	\$202.2	10%
Well above average (score = 4)	16	\$543.1	25%
<b>TOTAL OF MAPPABLE</b>	<b>66</b>	<b>\$2,176.8</b>	
<b>Unmappable projects</b>			
	# of projects	Total 10-year cost (in millions)	Percentage of total investment (unmappable projects only)
Do not have IPD score	189	\$15,217.7	87%
<b>TOTAL OF MAPPABLE + UNMAPPABLE</b>	<b>255</b>	<b>\$17,394.5</b>	<b>100%</b>

Source: DVRPC, 2023

DVRPC is not able to assign IPD scores and/or population percentages to projects that are not mappable from a geographical perspective or that are located in census tracts that lack statistically significant residential census data, so those projects were excluded from the analysis. For example, most projects in

the Transit Program are either systemwide, equipment related, or program line items with no mappable, physical locations. About one quarter of the unmappable projects are in the Transit Program. Projects that are in the Study and Development Program have no funding in the Highway or Transit Programs, so they are also excluded from the analysis. The majority of the other unmappable projects are statewide programs that provide funding for improvements such as signal and guiderail replacements, consultant services, etc. As shown in Table 11, 189 projects are unmappable, totaling 87% of the funding for the 10-year period (FY24–FY33) of the DVRPC FY2024 TIP for New Jersey.

**Review by Project Type**

Categorizing projects by their potential burdens or benefits enhances the transparency of a spatial investment analysis and project selection. Knowing a project’s impact type clarifies the implications of that project for the communities located near it and helps project implementation staff to prepare mitigation strategies. DVRPC staff assigns all TIP projects a primary project type based on their project descriptions in the TIP. The “South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide” assigned project categories into the three levels of potential impact: low, medium, and high, as shown in Table 12. As described in the guide,

“At the heart of EJ is the possibility that some projects may deliver regional benefits in terms of improved mobility and accessibility but have localized adverse effects that may be borne by EJ populations in proximity to the project. Roadway expansion projects may be the most typical of these types of projects. Such projects may be termed “projects of concern” and should be flagged as projects that will require environmental (NEPA) review during the project development phase.”

**Table 12:** Project Categorization and Potential Impacts Scheme from South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide

PROJECT CATEGORIES FOR EJ ANALYSIS	POTENTIAL IMPACT LEVEL
<ul style="list-style-type: none"> <li>- Transit Improvements</li> <li>- Bike/Pedestrian Improvements</li> <li>- Signal/ITS Improvements</li> <li>- Streetscape</li> <li>- Intersection/Interchange improvements</li> <li>- Safety</li> <li>- Studies (such as those listed in the Study and Development Program)</li> </ul>	<p><i>Lowest potential for adverse impacts or is Inherently beneficial</i></p>
<ul style="list-style-type: none"> <li>- Roadway and Bridge Maintenance</li> <li>- Bridge Repair or Replacement</li> <li>- Roadway New Capacity (minor)</li> <li>- Roadway Rehabilitation</li> </ul>	<p><i>Low potential for adverse impacts or is potentially beneficial</i></p>
<ul style="list-style-type: none"> <li>- New Right-of-Way Roadway</li> <li>- Roadway Expansion</li> </ul>	<p>Projects of concern: <i>High potential for adverse impacts</i></p>

Source: South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide, 2019

In the FY2024 TIP, a majority of projects with known impacts have “low potential for adverse impacts or are potentially beneficial” and comprise almost half (46 percent) of the total projects. Projects that have a high concern and “high potential for adverse impacts” make up 2 percent of the total projects. This makes sense as system preservation, not roadway new capacity or new right-of-way, remains one of the top

priorities in the DVRPC TIP-LRP Project Benefit Evaluation Criteria and reflects the priorities of the regional Long-Range Plan. Bridge Repair/Replacement and Roadway Rehabilitation have a “lower potential for adverse impacts” and comprise approximately a quarter of projects in the TIP.

**Table 13:** Project Categorization and Potential Impacts Scheme for DVRPC TIP, adopted from South Central Pennsylvania Environmental Justice Unified Process and Methodology Guide

Project Categories for TIP projects	Potential Impact Type	Number of Projects in NJ FY2024 TIP	Percentage of Projects in FY2024 TIP
<ul style="list-style-type: none"> <li>Roadway New Capacity</li> </ul>	Projects of concern: High potential for adverse impacts	5	2%
<ul style="list-style-type: none"> <li>Bridge Repair/Replacement</li> <li>Roadway Rehabilitation</li> </ul>	Lower potential for adverse impacts/potentially beneficial	66	26%
<ul style="list-style-type: none"> <li>Bicycle/Pedestrian Improvement</li> <li>Intersection/Interchange Improvements</li> <li>Local County &amp; Municipal Aid</li> <li>Signal/ITS Improvements</li> <li>Streetscape</li> <li>Transit Improvements</li> </ul>	Low potential for adverse impact/inherently beneficial	118	46%
<ul style="list-style-type: none"> <li>Other</li> </ul>	Unknown or little-to-no potential for adverse impact/inherently beneficial	66	26%
<b>TOTAL</b>		<b>255</b>	<b>100%</b>

Source: DVRPC, 2023

**Step 4: Identify and Address Potential Disproportionate and Adverse Impacts to Inform Future Planning Efforts**

DVRPC conducted the analysis of the FY2024 New Jersey TIP at a regional level to identify any potential disproportionately high and adverse impacts and determine what actions to take to address any impacts. As noted in Table 13, five projects are categorized as “Roadway New Capacity,” which means they are considered to have a higher potential for adverse impacts. Of those, one project is a statewide project that funds right-of-way acquisition. While three of the four remaining projects intersect with census tracts with above average concentrations of one or more communities of concern, two of the three projects

have evolved during the design process to focus on multimodal safety and operational improvements over roadway capacity, while the fourth is the Route 295/42/I-76, Direct Connection, Contract 4 project, which will have significant impacts on regional emissions and safety. All of these projects have followed the NEPA process detailed later in this chapter.

The DVRPC FY2024 New Jersey TIP does not appear to have a potential disproportionate and adverse impact to communities of concern. However, if disproportionate impacts were found in the TIP, DVRPC could take the following actions:

- Re-evaluate the current selection of projects in the TIP with planning partners;
- Explore and implement mitigation strategies;
- Use this information to inform the selection of projects for the next TIP update.

DVRPC does not serve as “judge or jury” in determining whether a project can be approved or rejected based on disproportionate burden. Rather, DVRPC is responsible for providing information and analysis to the TIP development process for planning partners to meet Title VI and EJ requirements and guidelines.

### 3.3 Fostering and Sustaining a Unified Process

DVRPC will continue to follow the best practices listed below to avoid disproportionate impacts on environmental justice and other communities of concern:

#### Better Engage Communities of Concern Early and Often in the Regional Planning Process

Involving members of communities of concern in the planning process early and often is an important part of preventing disproportionate burdens from transportation projects. DVRPC invites members of environmental justice and civil rights organizations and communities to participate in specific projects and on standing committees, such as the Public Participation Task Force (PPTF) and the Healthy Communities Task Force. DVRPC’s PPTF provides ongoing access to the regional planning and decision-making process, serves as a conduit for DVRPC information to organizations and communities, and assists with implementing public outreach strategies. The PPTF includes members selected through an application process designed to maintain a regionally inclusive task force with diverse interests and backgrounds, including EJ and Title VI populations. All members of the public are also encouraged to join a scheduled NJDOT public information center to learn more about any NJDOT sponsored project that they are interested in at [www.nj.gov/transportation/community/meetings](http://www.nj.gov/transportation/community/meetings). More broadly, members of the public are encouraged to engage with local municipalities, county planners, DVRPC, and NJDOT in the early stages of problem identification and project development. Lastly, DVRPC will continue to explore the benefits and burdens associated with transportation projects, particularly those that can be identified during the programming phase, to avoid, minimize, or mitigate disproportionate burdens, through its Title VI Compliance Program.

#### Continue to Incorporate Title VI and EJ in Project Selection (TIP-LRP Project Benefit Evaluation Criteria)

New candidate projects for the DVRPC FY2024 New Jersey TIP were evaluated using the DVRPC TIP-LRP Project Benefit Evaluation Criteria before projects were selected for the constrained draft TIP. This will continue during the life of the TIP (if there are available funds available for new projects) and for the next TIP update. The goal of the Project Benefit Evaluation Criteria is to provide a data-informed support tool to guide transportation project investment decisions. The Project Benefit Evaluation Criteria includes an Equity Criterion, weighted at 12 percent of the total score, which evaluates Equity as it is broadly defined

in the Long-Range Plan. This analysis relies on DVRPC’s IPD methodology, which includes EJ and Title VI populations, as well as other communities of concern. Projects receive points based on the IPD analysis for each census tract the project touches, including a population multiplier for each census tract. In addition, any project that increases vehicle speeds above 30 miles per hour or increases traffic volumes in census tracts with above-average or well-above average IPD scores will be given a score of 0 points for the Equity Criterion.

The Project Benefit Evaluation Criteria also includes consideration of areas with high concentrations of low income, minority, and other communities of concern as part of the Safety Criterion. Safety is the highest weighted criterion in the Project Benefit Evaluation analysis at 27 percent of the total score. Projects that implement safety strategies with proven benefits in locations identified by DVRPC's Crashes and Communities of Concern in the Greater Philadelphia Region analysis (Publication #18022) are awarded additional points.

### Explore Project-Level Opportunities for EJ

NJDOT evaluates potential adverse effects on EJ communities as part of the NEPA process. Recognizing that certain types of actions are unlikely to generate disproportionately high and adverse effects on EJ populations, PennDOT, in consultation with FHWA, developed a list of projects exempted from detailed project level EJ analysis (see PennDOT Publication #746 for further details). This resource was used for the DVRPC FY2024 TIP for New Jersey to evaluate TIP projects, and to keep a similar, federally approved methodology in place.

For non-exempted projects, information on EJ populations that was gathered during the planning process is evaluated and additional information about EJ populations in the project area is gathered if necessary. This includes going beyond the immediate project location to assess impacts from detour routes or impacts to transit services, as applicable. DVRPC helps provide data and guidance to this process and as requested at the project level. This analysis identifies and discusses both direct impacts and indirect/cumulative effects that would result from a given project, then determines if there are disproportionately high and adverse effects on EJ populations. If it is determined that there are disproportionate impacts that cannot be offset by project benefits, where feasible, strategies to minimize those effects are incorporated into the project.

Although the NEPA process is focused on avoiding and mitigating excessive burdens and adverse effects of transportation projects, it is also important to recognize the clear benefits of many projects on the TIP for the communities where the projects are located.

Taking a closer look at some of the projects in the categories above, there are numerous projects in the “Lower” and “Low” potential for adverse impact/inherently beneficial categories that are focused on providing benefits to communities with higher-than-average concentrations of Low-Income, Racial Minority, and Ethnic Minority populations. These include dozens of projects to repair bridges, pavement, and transit infrastructure, as well as numerous projects to improve safety. Specific examples of inherently beneficial projects in communities with high concentrations of EJ and Title VI populations include:

- Circulation Improvements around Trenton Transit Center (DB #D2023);
- Mount Ephraim Avenue Safety Improvements, Ferry Avenue (CR 603) to Haddon Avenue (CR 561) (DB #D1914);
- Kaighn Avenue (CR 607), Bridge over Cooper River (Roadway and Bridge Improvements) (DB #D1709);
- Transportation Alternative Set Aside: Greenwood Avenue Streetscape Project (DB #X107);

- Pedestrian and Bike Lane Improvements for Access to the Ashland PATCO Station (DB #X065);
- ADA South, Contract 4 (DB #1542);
- Parkway Avenue (CR 634), Scotch Road (CR 611) to Route 31 (Pennington Road) Safety Improvements and Mobility Improvements for Cyclists and Pedestrians (DB #D1910);
- PATCO Rail Replacement - Ferry Avenue to Broadway (DB #DR2008);
- Route 130, Bridge over Main Branch of Newton Creek (DB #16340);
- Northeast Corridor (NEC) Improvements (DB #T44);
- North Olden Avenue (CR 622), Bridge over Amtrak (Study and Development) (DB #17412);
- Lincoln Ave/Chambers Street (CR 626), Bridge over Amtrak & Assunpink Creek (DB #D1710); and
- Route 130, CR 545 (Farnsworth Avenue) Pedestrian and Bicycle Improvements (DB #12346A).

Appendix G contains various maps that illustrate mappable highway and transit projects in the TIP along with concentrations of low-income and racial and ethnic minority populations.