



Hinesville Area Metropolitan Planning Organization

Title VI Program and Environmental Justice Analysis

Adopted: December 13, 2012

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Visit our website for the most up-to-date information and downloadable documents at www.thelcpc.org and click on the HAMPO tab.

Resolution of Adoption

RESOLUTION BY THE HINESVILLE AREA METROPOLITAN PLANNING ORGANIZATION POLICY COMMITTEE ADOPTING THE TITLE VI PROGRAM AND ENVIRONMENTAL JUSTICE ANALYSIS

WHEREAS, on February 14, 2007 the U.S. DOT published the final rules incorporating changes to the Code of Federal Regulations due to the passage of the legislation, Safe, Accountable, Flexible, Efficient Transportation Equity Act: a Legacy for Users (SAFETEA-LU) and now Moving Ahead for Progress in the 21st Century (MAP-21), and these require that the Metropolitan Planning Organization, in cooperation with participants in the planning process and others, develop and update as necessary the *Title VI Program and Environmental Justice Analysis*; and,

WHEREAS, the Hinesville Area Metropolitan Planning Organization is the Metropolitan Planning Organization for the Hinesville urbanized area; and,

WHEREAS, the urban transportation planning regulations require that the product of a planning process be certified as in compliance with all applicable requirements of the law and regulations; and,

WHEREAS, the staff of the Hinesville Area Metropolitan Planning Organization and the Georgia Department of Transportation have reviewed the organization and activities of the planning process and found them to be in compliance with the requirements of the law and regulation; and,

WHEREAS, the locally developed and adopted process for private sector participation has been followed in the development of the; and,

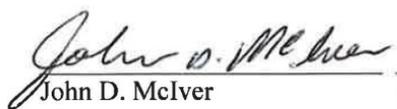
NOW, THEREFORE, BE IT RESOLVED that the Hinesville Area Metropolitan Planning Organization Policy Committee adopts the *Title VI Program and Environmental Justice Analysis* as set forth in the document attached to this Resolution;

BE IT FURTHER RESOLVED that the Hinesville Area Metropolitan Planning Organization Policy Committee finds that the requirements of applicable law and regulation regarding urban transportation planning have been met and authorizes the Executive Director of the Liberty Consolidated Planning Commission to execute a joint certification to this effect with the Georgia Department of Transportation, if necessary.

CERTIFICATION

I hereby certify that the above is a true and correct copy of a Resolution adopted by the Hinesville Area Metropolitan Planning Organization Policy Committee on December 13, 2012.

Attest:


John D. McIver
Chair, HAMPO Policy Committee

12-13-12
(date)


H.E. "Sonny" Timmerman
Executive Director, Secretary

12/13/2012
(date)

Introduction

The Hinesville Area Metropolitan Planning Organization (HAMPO) is the Metropolitan Planning Organization (MPO) for the Hinesville urbanized area, all of Liberty County, and part of Long County. HAMPO is responsible for the federally required transportation planning process, with a designated study area including all of both counties.

This document details the HAMPO Title VI Program and Environmental Justice (EJ) Analysis.

List of Acronyms

EJ	Environmental Justice
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
CAC	HAMPO Citizens Advisory Committee
PC	HAMPO Policy Committee
HAMPO	Hinesville Area Metropolitan Planning Organization
LEP	Limited English Proficiency
LRTP	Long-Range Transportation Plan
MPO	Metropolitan Planning Organization
NEPA	National Environmental Policy Act
PPP	Public Participation Plan (PPP)
TIP	Transportation Improvement Program (TIP)
UPWP	Unified Planning Work Program (UPWP)
USDOT	United States Department of Transportation (USDOT)
USEPA	United States Environmental Protection Agency (USEPA)

Title VI and Environmental Justice

Environmental Justice (EJ) is a requirement of federal, state, and local agencies and has legal basis in the Title VI of the Civil Rights Act of 1964, Executive Order 12898 of 1994, and National Environmental Policy Act (NEPA). These regulations require that all agencies receiving federal assistance demonstrate compliance with related laws so that all the populations in the agency's study area enjoy the same benefits of the federal investments, bare the same burdens resulted from the federal projects, and have equal participation opportunities in the local and state issues.

The United States Environmental Protection Agency (U.S. EPA) Office of Environmental Justice defines EJ as:

“The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socio-economic group should bear a disproportionate share of the negative environmental consequences

resulting from industrial, municipal, and commercial operations or the execution of federal, state, local and tribal programs and policies.”

In general, this means that for any program or activity for which any federal funds will be used, the agency receiving the federal funds:

- Must make meaningful effort to involve low income and minority populations in the processes established to make the decision about the use of the federal funds, and
- Must evaluate the nature, extent, and incidence of probable favorable and adverse human health or environmental impacts of the program or activity upon minority or low-income populations.

Requirements

President Clinton in 1994 signed Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. This Order served to amplify the provisions of the Title VI of the Civil Rights Act of 1964.

Title VI of the 1964 Civil Rights Act states that “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.” Title VI bars intentional discrimination as well as disparate impact discrimination (i.e. a neutral policy or practice that has a disparate impact on low income or minority groups).

The Environmental Justice Executive Order amplifies Title VI by providing that “each Federal agency shall make achieving environmental justice part of 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 or low income populations.”

In compliance with the Executive Order, the U.S. Department of Transportation (USDOT) issued its final order in 1997 to describe the process to incorporate EJ principles into existing programs, policies, and activities. In response, the Federal Highway Administration (FHWA) issued its action statement to address Environmental Justice in 1998, outlining specific issues to be addressed about EJ to assure that States and Metropolitan Planning Organizations (MPOs) are in compliance with EJ guidelines. USDOT has subsequently issued an “Updated Environmental Order Justice Order 5610.2(a)” as signed by the Secretary of Transportation on May 2nd, 2012 (updated the original order as issued on April 15th, 1997). This update to HAMPO’s Title VI and EJ Analysis conforms to the updated Environmental Order Justice Order 5610.2(a).

The Hinesville Area Metropolitan Planning Organization (HAMPO) boundary was approved on May 24th, 2005 and the certification of the MPO was approved on August 15th, 2005. HAMPO prepares this Environmental Justice analysis and Title VI Program in response to the federal and state

requirements, but also to facilitate equitable transportation planning in the Hinesville urbanized area and Liberty and Long Counties.

Title VI Notice

The Title VI Public Notice is included as Appendix A to this document.

Instructions to Submit a Title VI Complaint

The “Complaint Resolution Procedure to Ensure Non-Discrimination in Federally Assisted Programs or Activities Participated in by the Hinesville Area Metropolitan Planning Organization” containing the purpose, scope, responsibilities and complaint form is included as Appendix B to this document.

Title VI Investigations, Complaints, and Lawsuits

There have been no investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs since the last approval of the HAMPO Title VI Program in 2005.

Public Participation Plan

The Title VI compliant Public Participation Plan (PPP) is attached as Appendix C. This plan details participation plan components to engage minority and limited English proficient populations and other constituencies that are traditionally underserved, such as people with disabilities, and low-income populations. The PPP includes HAMPO’s plan to provide language assistance to persons with limited English proficiency.

Public Participation Activities

Recognizing the importance of involving the public in planning for the future of this region, HAMPO developed a proactive and interactive planning process, providing the opportunity for the community to play an integral role in transportation planning. The public involvement requirements are specifically stipulated in the “Public Involvement Plan” that was adopted by the HAMPO Policy Committee in 2003. This plan is developed for HAMPO to provide the public an opportunity to participate in, to review, and to comment upon the formulation of transportation plans, policies and projects. The process provides a set of procedures to be consistently applied to incorporate public participation in the transportation planning process.

Participation Selection

The efforts to obtain meaningful public input for EJ consists of two parts: through appropriate committee participation, and through resident participation.

Committee Participation

The HAMPO Citizens Advisory Committee (CAC) is representative of all cross-sections of the community and functions as a public information and involvement committee. The CAC is entrusted with informing the HAMPO Policy Committee (PC) of the community's perspective while providing information to the community about transportation policies and issues.

All the HAMPO plans and programs go through these two committees for review and comments before they can be adopted by the Policy Committee. The 2035 Long-Range Transportation Plan (LRTP) and the yearly-updated Transportation Improvement Program (TIP) are no exceptions.

Resident Participation

Besides the committees that represent various populations and communities in Liberty County, HAMPO has made efforts to involve all the transportation system users (motorists, bicyclists, pedestrians, etc.) in the public involvement process. HAMPO has made a particular effort to include the EJ target populations in the long-range plan development process, including minorities, low-income persons, persons with disabilities, elderly populations, and child advocates or school personnel.

Racial Makeup of Committee Membership:

The following table shows the racial makeup of the HAMPO standing committees as of the date of this analysis:

Committee:	membership	female	%female	minority	%m
HAMPO Policy	16	5	31%	7	44%
HAMPO Technical Coordinating	23	8	35%	6	26%
HAMPO Citizens Advisory	15	4	27%	7	47%
Liberty Transit Steering	4	1	25%	2	50%

As the committees expand and/or membership changes occur, the racial makeup will be subject to change. HAMPO staff will monitor the participation levels of minority populations and perform focused outreach and education regarding the planning process as needed to ensure minority participation will continue to reflect the demographics of the MPO area.

Outreach Methods

HAMPO involves our community through public meetings and the standing committees (Citizens, Technical, Policy and Transit) in each step of the TIP, LRTP, EJ and PPP development processes. HAMPO staff presents the information to the public and committees at their respective meeting, invite comments and answer questions. Comments from both the committees and public are investigated in the plan development process and incorporated into the plans.

The public involvement of the Liberty County residents includes a combination of the following methods; public meetings, sending draft plans to the reviewing agencies, public libraries, publishing the meeting notices in newspapers, sending invitations to neighborhood associations (including the EJ population concentrated neighborhoods), local governments through their participation in the committees, advertising the meeting notices on HAMPO's website (<http://thelcpc.org/HAMPO>) and newspaper community calendars, etc. The public notices contain directions to HAMPO' web-site where the document is available for review and comment. HAMPO actively strives to identify new and effective methods for public outreach.

HAMPO staff also makes every effort to attend the neighborhood association meetings and local government meetings. Staff assists in preparing mapping and statistical information to facilitate the meetings.

Public Outreach Contacts

The public outreach contacts include news media, elected officials, people who came to the meetings before, and people who have sent comments to HAMPO before about their transportation needs.

Information Presentation Methods

Besides giving formal presentations with visualization tools, HAMPO prepares information boards with maps and pertinent information, asks for and takes questions, and tries to have one-to-one conversations with the participants at or after public meetings. HAMPO distributes comment sheets to the participants so that they can either write down their comments at the meeting or take the sheets back to their neighborhoods for distribution.

Demographic Profile of HAMPO Area

Demographic Terms

Low-Income means a person whose median household income is at or below the Department of Health and Human Services poverty guidelines.

Low-Income Population means any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed USDOT program, policy or activity.

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

North America and who maintains cultural identification through tribal affiliation or community recognition); and (5) Native Hawaii or Other Pacific Islanders (a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands). Additionally, any person who responded to the US Census as being either solely or a mix of one of these minority groups qualifies as being in the minority population.

Minority Population means any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed USDOT program, policy or activity.

Title VI and EJ Populations

The following figures below show relevant demographic characteristics of population in the study area, including poverty status, racial and ethnic background, vehicle ownership, and language.

Figure 1 shows that the largest concentration of households below poverty is on Fort Stewart, with additional concentrations in the Walthourville area and eastern Long County.

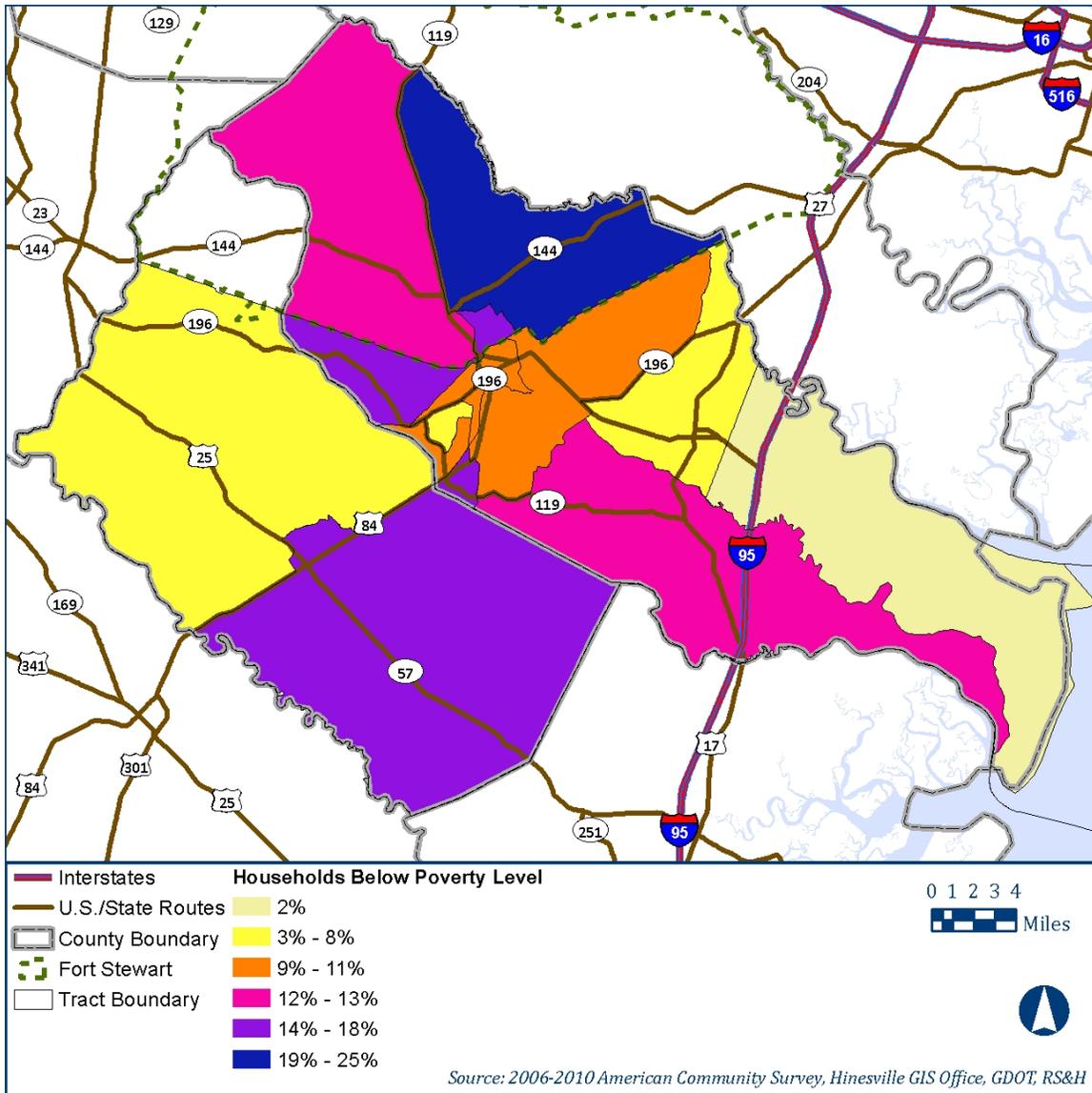


Figure 1 Percent of Households below Poverty by Census Tract

Figure 2 show that Fort Stewart includes relatively high numbers of households with no vehicle available.

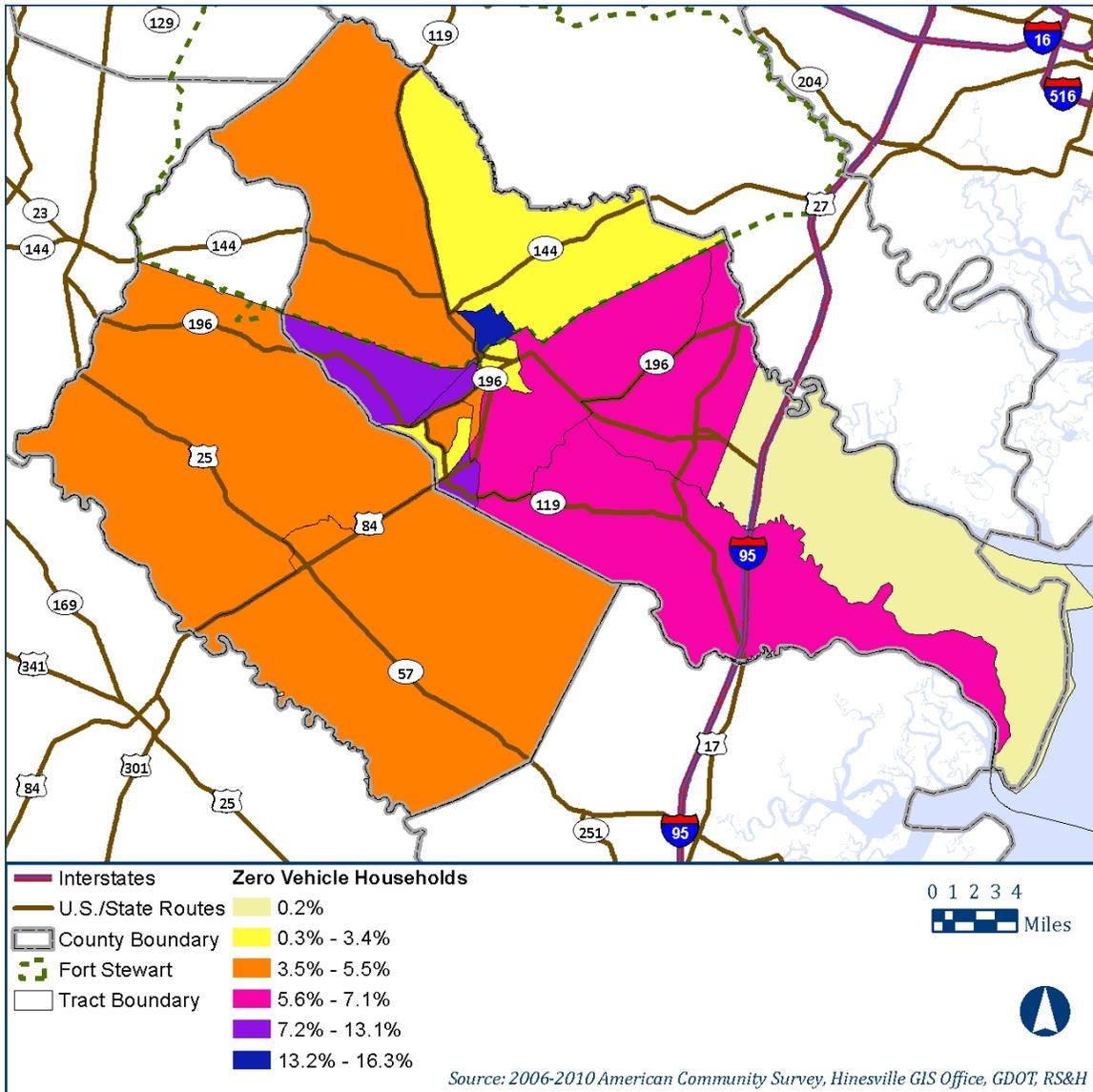


Figure 2 Households with No Vehicle by Census Tract

Figure 3 shows that racial minorities are spread throughout the study area, with a concentration in the Riceboro area and in tracts in Hinesville, Allenhurst, and Walthourville.

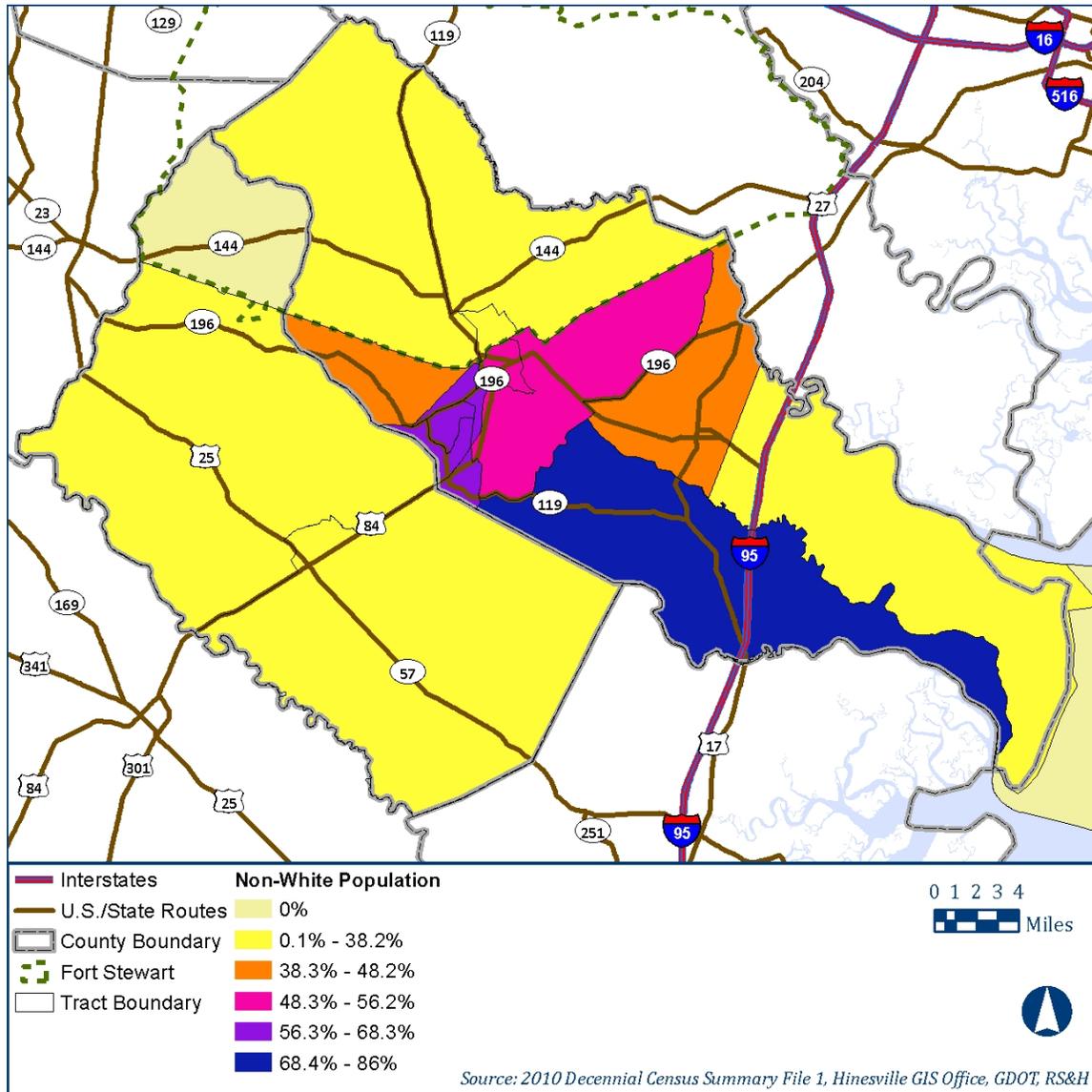


Figure 3 Non-white Population by Census Tract

Figure 4 shows relatively high levels of Limited English Proficient (LEP) populations in Hinesville, on Fort Stewart, and in western Long County. However, the highest percent of LEP populations is 6.8%.

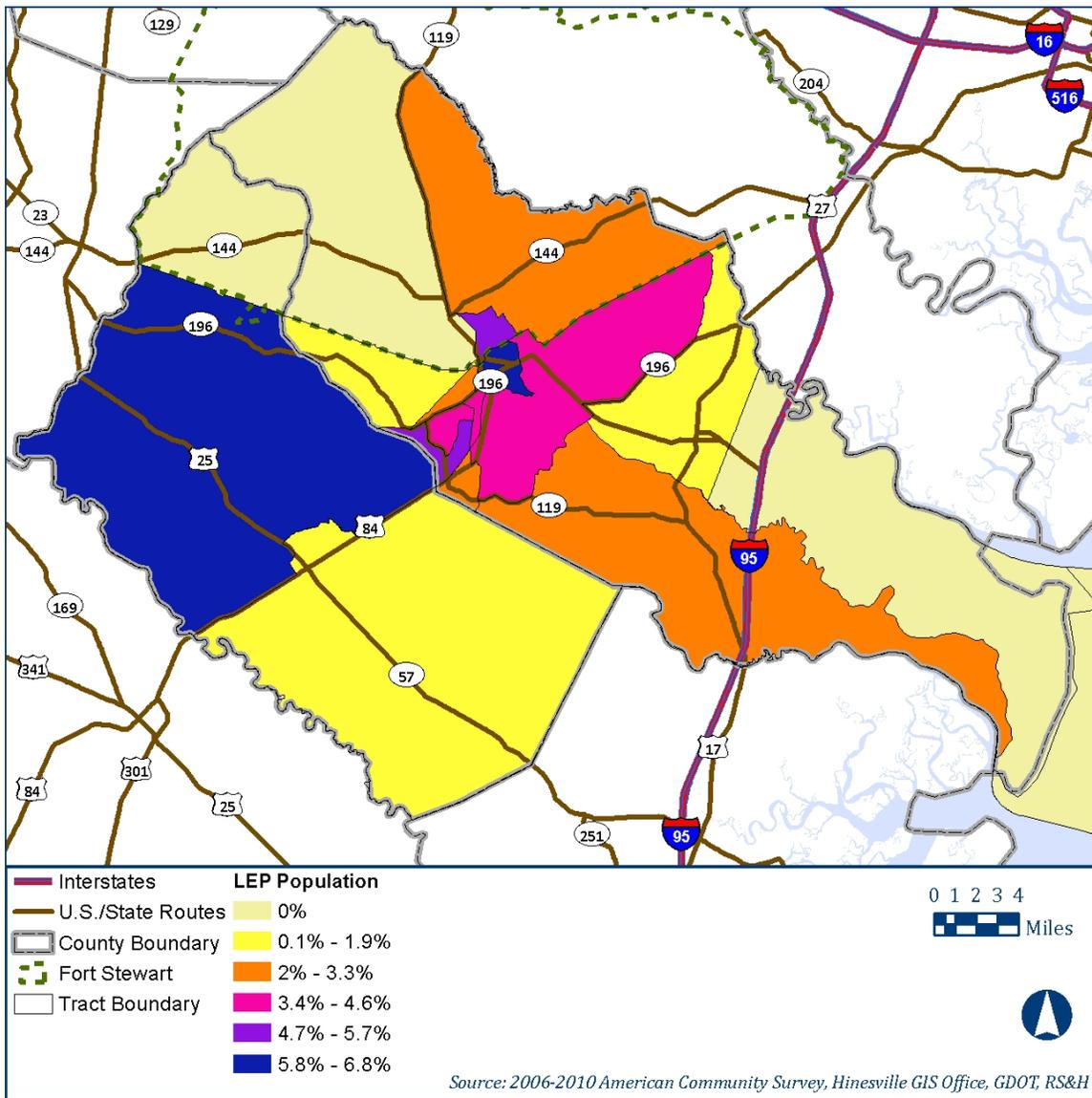


Figure 4 LEP Population by Census Tract

Figure 5 shows the percent of population that reports a Hispanic or Latino origin.

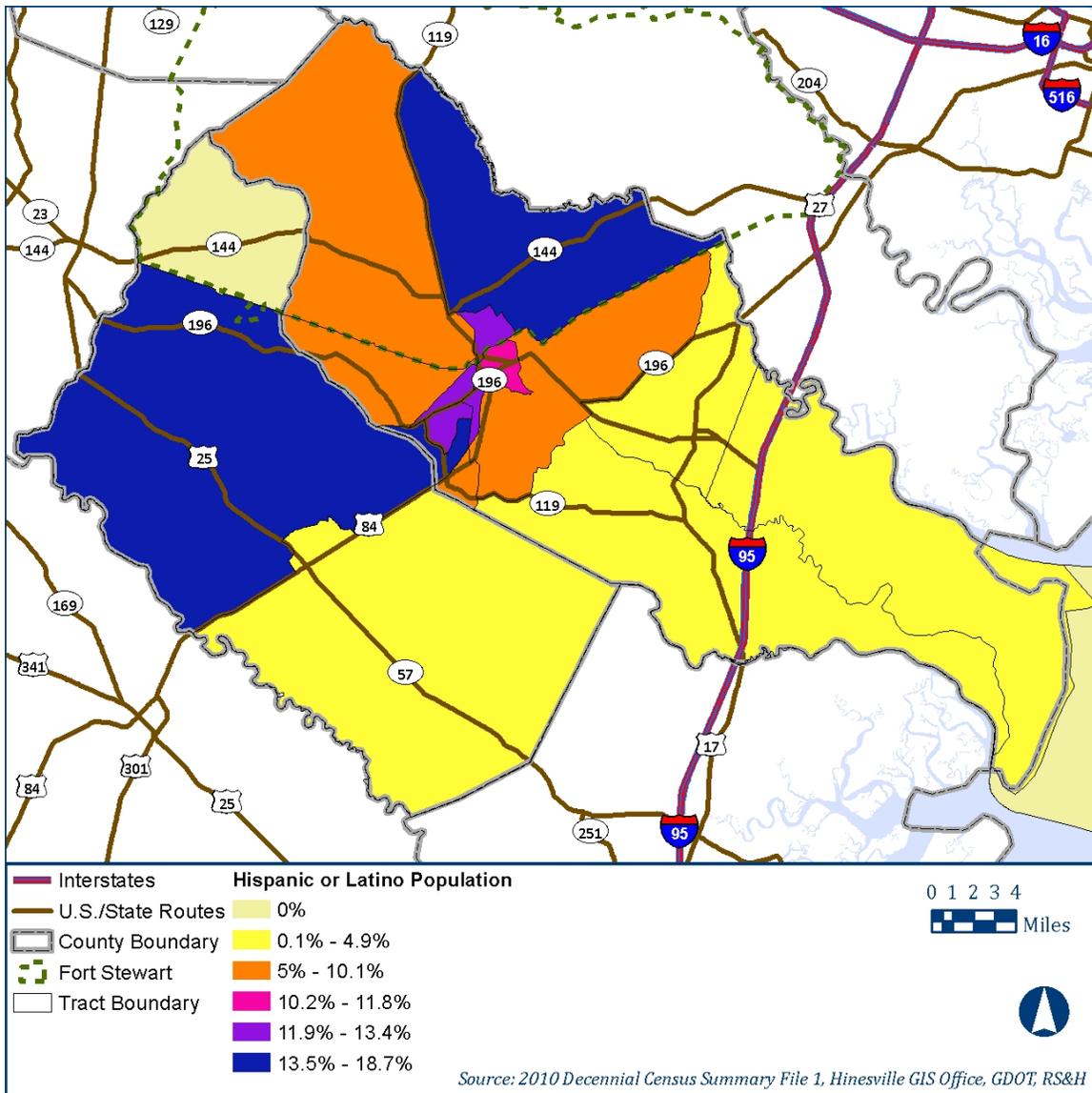


Figure 5 Percent of Population that is Hispanic or Latino by Census Tract

Title VI and EJ Target Population in HAMPO Study Area

The target populations in the HAMPO transportation planning area include minorities (blacks, Hispanic populations, Asian Americans, American Indians and Alaskan Natives, Native Hawaiian or Other Pacific Islanders, and people with two or more races) and Low-Income population (persons below poverty). This information is used for the equitable public involvement process and for planning other related transportation improvements. The thresholds used for defining target populations are the regional average.

The table below summarizes thresholds for determining Title VI target populations and environmental justice populations in the two-county study area. When these parameters are applied to each tract, the majority of tracts meet one or more thresholds. Both populated tracts in Long County and all but two populated tracts in Liberty County meet a threshold to become a target area. Of course, within each tract, the distribution of target populations will vary. Table 3 Target Census Tracts shows tracts with a target population above the study area threshold highlighted.

Table 1 Summary Demographic Profile

Liberty County Demographic Profile	
Nonwhite population as percent of total	52.9%
Percent of Population that is a Racial or Ethnic Minority (Nonwhite or Hispanic)	57.3%
Percent of Families below Poverty	15.0%
Percent of Households below Poverty	15.0%
Percent of Households with No Vehicle	5.9%
Percent LEP Population	3.7%
Percent Spanish/Spanish Creole LEP Population	2.3%
Long County Demographic Profile	
Nonwhite population as percent of total	37.6%
Percent of Population that is a Racial or Ethnic Minority (Nonwhite or Hispanic)	41.3%
Percent of Families below Poverty	11.6%
Percent of Households below Poverty	11.6%
Percent of Households with No Vehicle	4.8%
Percent of LEP Population	3.9%
Percent Spanish/Spanish Creole LEP Population	3.8%
Study Area Profile	
Nonwhite population as percent of total	50.1%
Percent of Population that is a Racial or Ethnic Minority (Nonwhite or Hispanic)	54.3%
Percent of Families below Poverty	14.5%
Percent of Households below Poverty	14.5%
Percent of Households with No Vehicle	5.7%
Percent of LEP Population	3.7%
Percent Spanish/Spanish Creole LEP Population	2.5%

Figure 6 and 7 show tracts that are above average concentrations of low income and minority populations with figure 8 showing where households with no vehicle are over-represented.

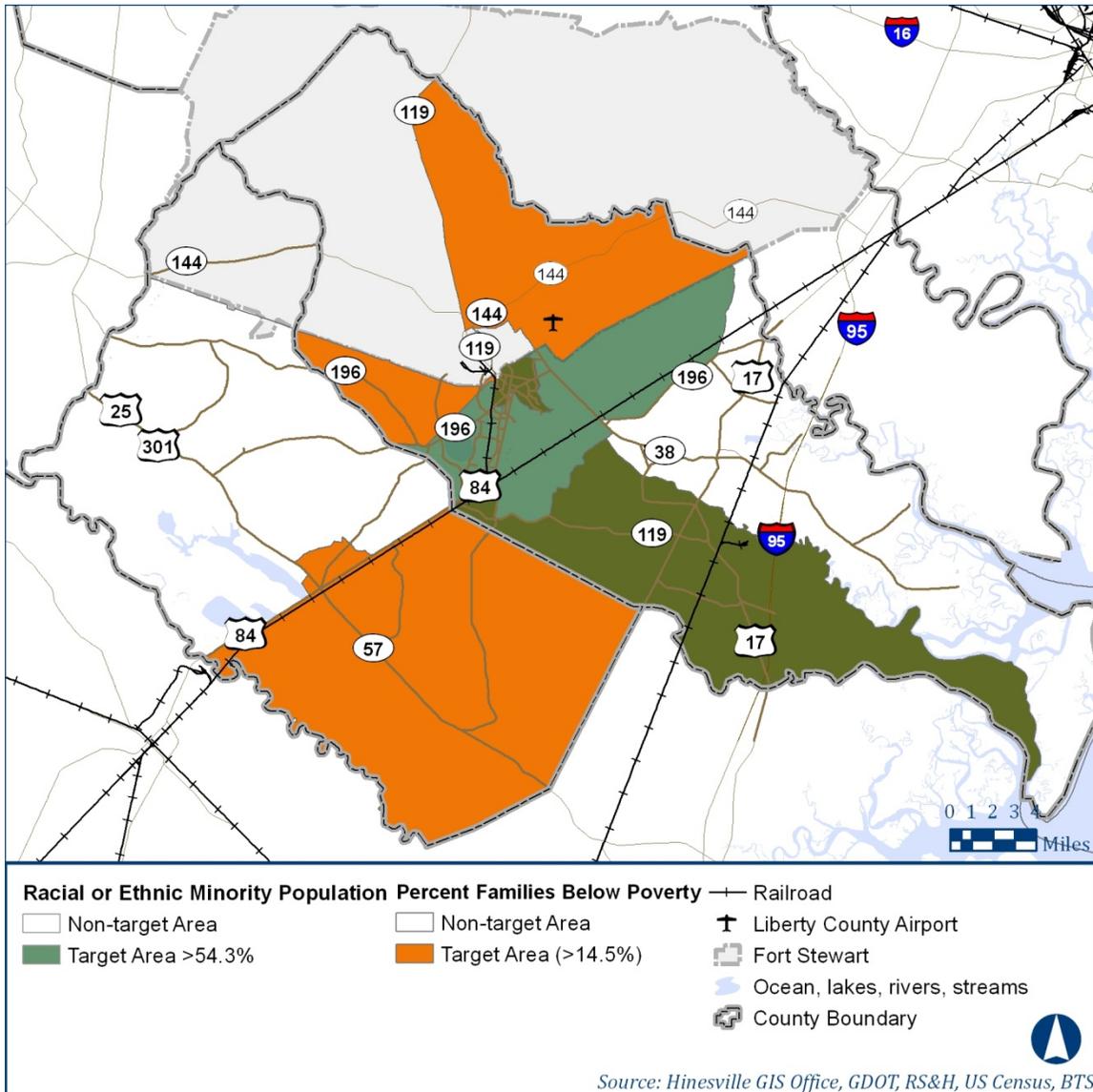


Figure 6 Target Areas of Poverty and Minority Populations by Census Tract

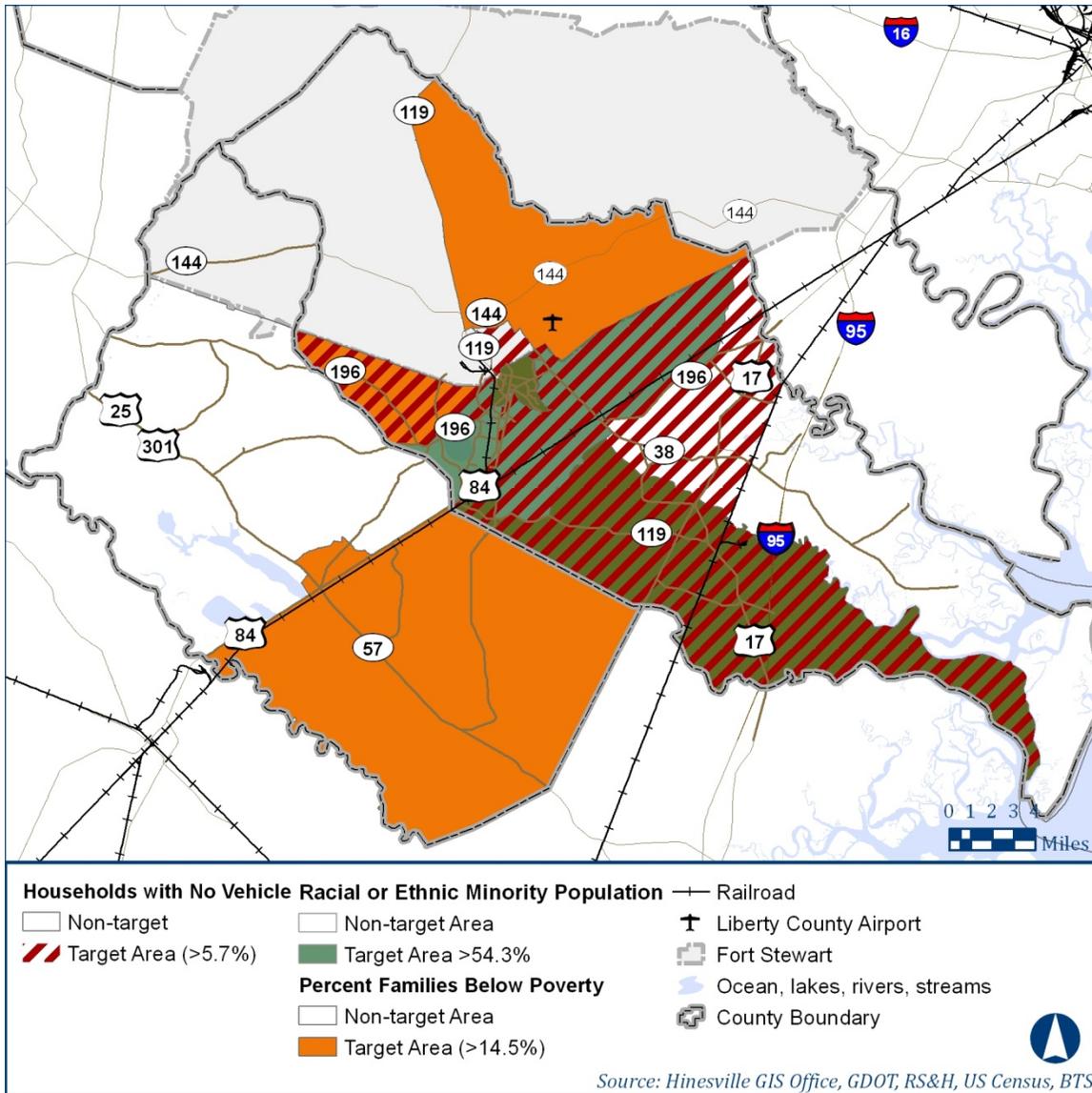


Figure 7 Target Areas Including No Vehicle Households by Census Tract

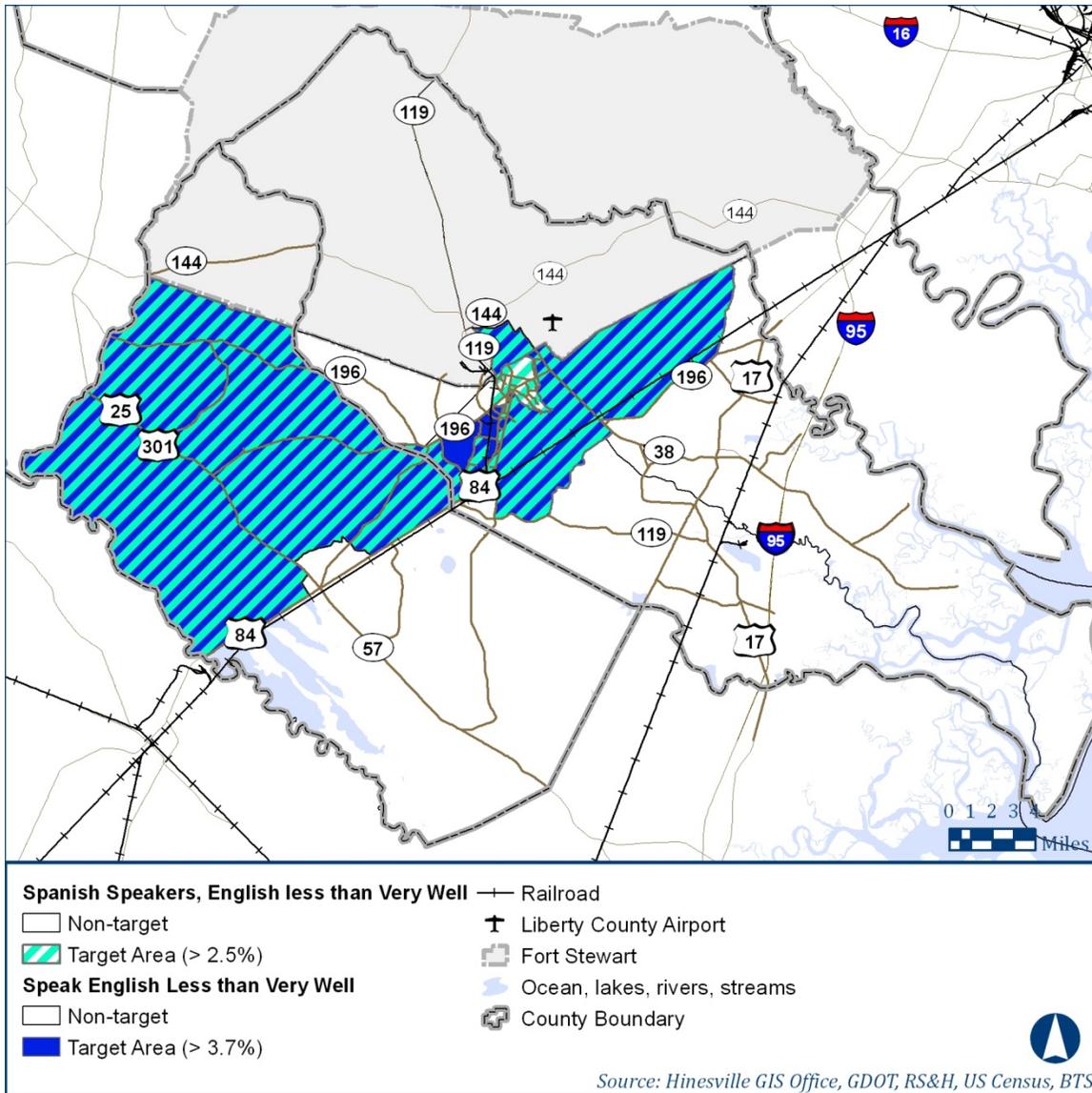


Figure 8 LEP Population Target Areas by Census Tract

The table below shows that the vast majority of the study area has been identified as a target area, with over 90% of the total population in a target area, and an even higher proportion of minorities reside in the target area. The inclusion of such a large proportion of the study area within the target area indicates the diversity of the study area.

Table 2 Percent of Population in Target Areas

	Percent of Study Area Population	Percent of Minority Population
Target Area	92.2%	96.2%
Non-target Area	7.8%	3.8%

Table 3 Target Census Tracts in One or More Category (Marked with 'X')

Liberty County Tracts	
X	101.01
	101.02
X	101.03
X	102.02
X	102.04
X	102.05
X	102.06
X	102.07
X	102.08
X	103
X	104
	105.01
X	105.02
X	106
Long County Tracts	
X	9701
X	9702

Environmental Justice Analysis

The HAMPO Title VI Program and EJ Analysis are based partially upon the GDOT draft EJ planning guidelines issued in 2005. The document has been updated per FTA Circular 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients and FTA Circular 4702.1B, Title VI Guidelines for FTA Recipients.

The process includes:

- Identify the potential burdens and benefits.
- Identify the target populations within the study area.
- Correlate the identified burdens and benefits to the target populations.
- Note possible mitigation strategies for identified disproportionate burdens.
- Determine which public participation methodologies to use.
- Make environmental justice recommendations.
- Evaluate the implementation of the EJ process.

Objective

As the designated Metropolitan Planning Organization that does transportation planning for the Hinesville Urbanized Area, all of Liberty County, and part of Long County. The Hinesville Area Metropolitan Planning Organization (HAMPO) determined to assess the impacts of the transportation planning process, the Long Range Transportation Plan (LRTP) and the Transportation Improvement Program (TIP) on minority and low-income populations. In addition HAMPO has defined other target populations (the disabled, the elderly, and the children), identified their transportation needs, and explored ways to satisfy those needs.

HAMPO incorporated three principles to ensure that environmental justice considerations are properly integrated into the transportation planning process. They are:

- Ensuring adequate public involvement of the target populations (low-income, minority, the disabled, the elderly, and children) in regional transportation decision-making.
- Assessing whether there are disproportionately high adverse impacts on the target populations.
- Assuring that the target populations receive a proportionate share of benefits of federal transportation investments.
- Identify Potential Burdens and Benefits.
- Establishment of Objectives and Goals.

The first step in identifying and addressing potential burdens and benefits on target populations occurs during the establishment of goals and objectives in the planning process. HAMPO developed its EJ objectives and goals corresponding to the FHWA guidelines (Publication NHI-02-034), thus the overall goals that address EJ in the planning process include the following:

- Enhance accessibility and mobility
- Promote system preservation
- Enhance quality of life and health
- Improve safety
- Promote economic development, and
- Improve operational efficiency
- Identification of Performance Measures

The next step involves establishing meaningful performance measures to determine burdens and benefits. These measures are developed to test against the planning goals defined above.

The GDOT, “EJ Guidelines” define some performance measures such as average number of jobs within 20 minutes by driving, average number of jobs within 40 minutes by bus, transit ridership per capita, frequency of transit service, number of high-accident locations, accidents per year, average travel time for home-based work trip, average travel time for home-based other trips, percent of

population close to a hospital, percent of population close to a college and percent of population close to a major retail destination.

Even though these measures are comprehensive, it is hard to determine how some of them can be correlated to the EJ target populations. HAMPO decided to perform the EJ analysis by ensuring fair public involvement and by comparing the total proposed improvements within and outside of the EJ target areas. Specifically, the performance measures include the following transportation modes:

- Highway
- Highway Investments
- Displacement from Highway Projects
- Public Transit
- Fixed route bus service
- On-demand public transportation service

The figures 9 and 10 show who the 2035 LRTP transportation investments and target areas for Title VI and Environmental Justice. Table 5 shows the distribution of transportation investments in target and non-target areas.

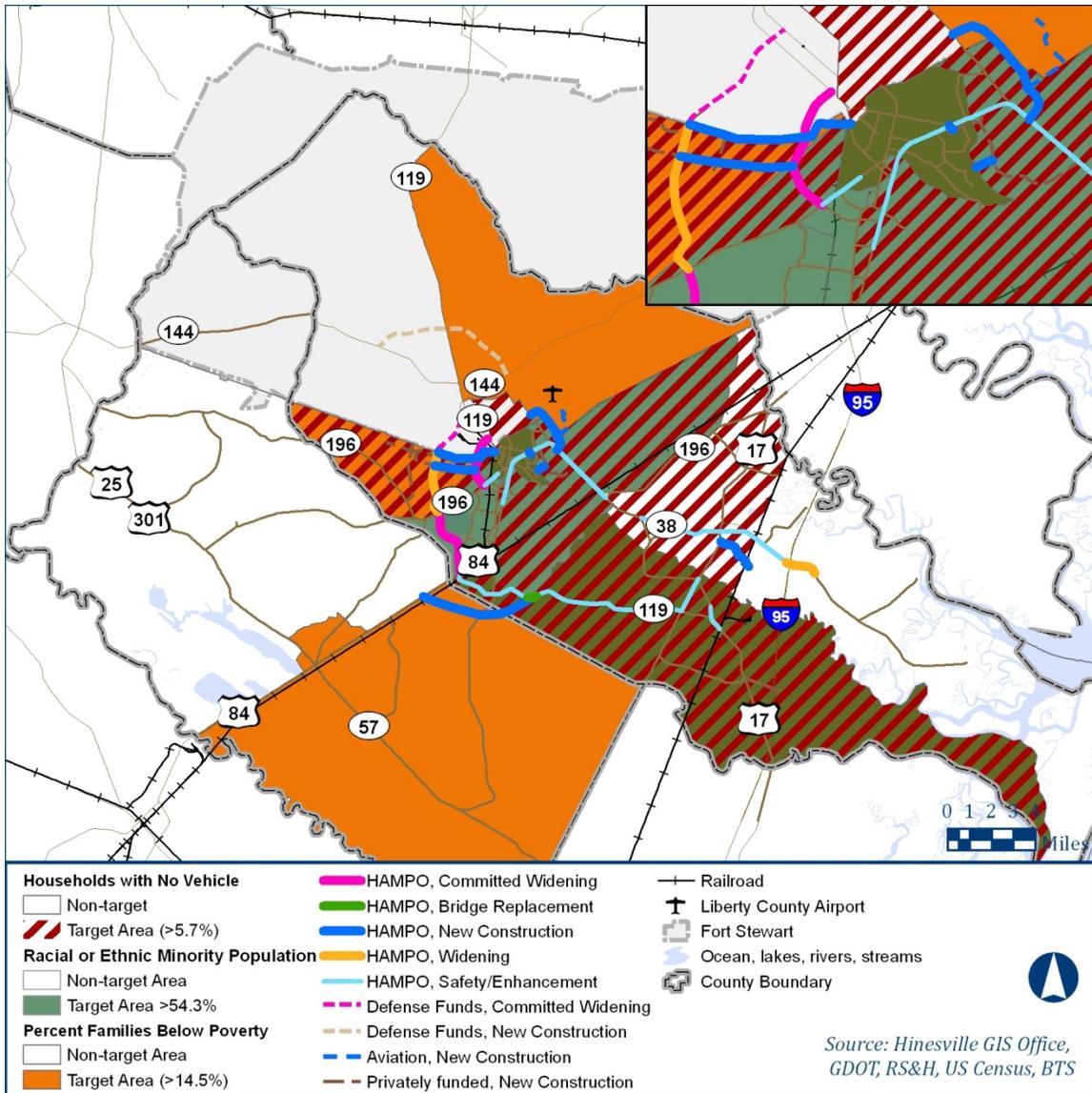


Figure 9 Target Areas and LRTP Projects

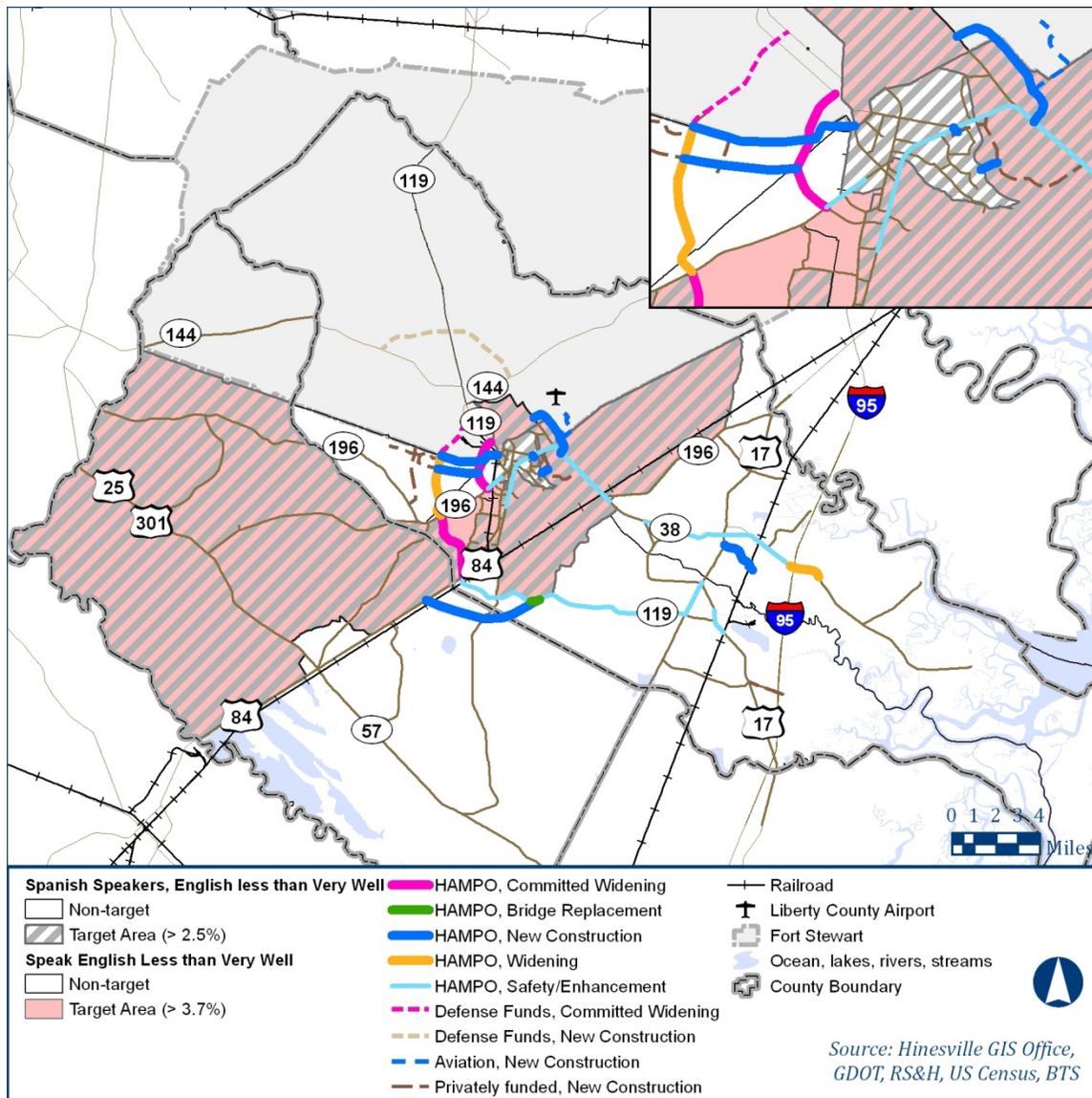


Figure 10 LEP Areas and LRTP Projects

Identification of Benefits and Burdens in the Study Area

With the performance measures established, the potential benefits and burdens can be identified and measured. The following table lists some of the benefits and burdens and possible mitigation strategies identified by HAMPO.

Table 4 Potential Benefits and Burdens

Proposed Project Type	Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Highway System			
New Road	<p>Enhance accessibility and mobility.</p> <p>Promote economic development.</p> <p>Improve safety.</p> <p>Improve operational efficiency.</p>	<p>Benefits limited to populations with motor vehicles.</p> <p>Increase in noise and air pollution.</p> <p>Might impact existing neighborhoods.</p>	<p>Signal synchronization, pedestrian crosswalks, bike lanes, bus route addition, etc.</p> <p>Select ROW for minimum impacts.</p> <p>Try to incorporate context-sensitive design to maintain the neighborhoods.</p>
Resurface/Upgrade of existing roadways	<p>Promote system preservation</p> <p>Improve safety.</p> <p>Improve operational efficiency.</p>	<p>Expansion of shoulder width impinges on residential property.</p> <p>Diverted traffic during project construction causes heavy traffic and dangerous conditions on city streets.</p> <p>Noise and air pollution during construction.</p>	<p>Build curbing and sidewalks rather than shoulders.</p> <p>Close large section of roadways on weekends to increase resurfacing productivity.</p> <p>Reroute traffic to major streets if possible.</p>
Pedestrian			
<p>Addition of Pedestrian Amenities and/or Safety Provisions</p> <p>Addition of Bike Routes on Existing Roads</p>	<p>Improve quality of life, health and environment by encouraging people to use the bike/pedestrian facilities.</p> <p>Improve safety to pedestrians and bike riders.</p> <p>Provide an alternative to motor vehicles.</p>	<p>“Bump-outs” and traffic calming measures make commercial deliveries difficult.</p> <p>Bike routes takes space for passing turning cars at intersections and reduce on-street parking.</p>	<p>Need to come up with some original improvement plans to accommodate both motor vehicle traffic and bike/pedestrian usage.</p>
Other Transportation Projects			
<p>Multi-modal connection</p> <p>ITS improvements</p> <p>CMS strategies</p>	<p>Enhance mobility and accessibility.</p> <p>Improve safety.</p> <p>Enhance system preservation and operational efficiency.</p>	<p>Some ITS projects might be expensive to implement</p>	<p>Multi-modal incorporates transit stations and other modes.</p> <p>Have a comprehensive design before any ITS projects are implemented.</p>

The ultimate result of the MPO planning process is the Long Range Transportation Plan (LRTP). The Transportation Improvement Program (TIP) is the subset or short-range of the LRTP that has specific funding identified and is scheduled over the next three years. In the HAMPO Environmental Justice analysis, funding or investments have been applied to the set of projects in the LRTP and TIP and compared to relative treatment of and the impacts on the target populations and non-target populations in the planning area. This should provide some information on whether or not the transportation investments being made in the region are having disproportionate adverse impacts on the target populations and if the benefits from these investments are equally distributed.

In order to identify whether there are any adverse or disproportionate impacts on the target populations, measures need to be identified. These measures would compare the relative treatment of the target vs. non-target populations and areas in the planning process, and in the LRTP and TIP.

For the measures to be meaningful and capable of being applied, HAMPO determined to use the following indexes.

- Roadway investments in target and non-target areas
- Public transportation investments in target and non-target areas

Table 5 Programmed Transportation Investments

	% of Population	Percent of LRTP Roadway Project Costs	Fixed Route and Route Deviation Urban Transit	On-Demand Rural Transit
Target Area	92.2%	82.3%	100%	78% (percent of coverage area that is a target area)
Non-target Area	7.8%	17.7%	0%	22%

Limited English Proficiency: Four Factor Analysis

The number or proportion of Limited English Proficiency (LEP) persons eligible to be served or likely to be encountered by the program or recipient within the HAMPO study area. There are 2,571 persons who reported that they speak English less than very well, representing 3.7% of the population. All of these individuals are likely to use the transportation system and be affected by transportation planning. The largest concentration of LEP populations is in downtown Hinesville, with another concentration in western Long County. Fort Stewart and the area along the Liberty-Long County boundary also contain LEP target areas. Of the LEP persons, 1,767 speak Spanish or Spanish Creole, the only LEP language group that meets the threshold for a Safe Harbor Provision under Title VI guidance from the FTA. Spanish speakers who reported that they speak English less

than very well are concentrated in Hinesville, Flemington, western Long County, and on Fort Stewart.

The frequency with which LEP individuals come into contact with the programs are a low proportion of the population, even where they are represented in relatively high numbers. However, transportation planning affects LEP populations throughout the planning process and in particular during special transportation studies and the regular update of the Long Range Transportation Plan and Transportation Improvement Program.

The nature and importance of the program, activity, or service provided by the programs to people's lives are transportation planning and the investment decisions carried out by the MPO which impacts the mobility and access of LEP populations. The provision of public transportation within the urbanized and rural areas provides mobility across both counties, albeit within the restrictions of the services provided.

The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. The MPO can use Federal transportation planning funds as well as local matching funds to provide outreach as part of the daily activities of the agency. Specifically, studies funded by Federal Transit Administration (FTA) Section 5303 and 5307, and FHWA UPWP, include outreach to LEP and other target populations.

Target Population Mobility Needs

Mobility needs of target populations are identified through both public outreach and technical analysis in the transportation planning process. Public outreach includes workshops held in locations accessible to target populations spread throughout the study area, including the Liberty County Justice Center in Hinesville, Hinesville City Hall, Midway Civic Center, Riceboro Community Center, and the Long County Senior Citizens Center in Ludowici. Locations in Hinesville are accessible via the Liberty Transit bus service. The other locations are accessible via Coastal Regional Coaches or Long County on-demand transit services. Additionally, representatives of target Title VI populations are included on the Long Range Transportation Plan Stakeholder Advisory Committee, an ad-hoc committee formed to expand the reach of the standing HAMPO Citizens Advisory Committee as well as in stakeholder outreach for specific studies as needed.

Specific electronic and paper copy surveys are also available to those who cannot attend public workshops or committee meetings. Surveys have been used for the LRTP as well as other transportation studies, including the Liberty Transit Operations Plan, Gateway Sector Plan, Flemington Loop Alignment Study and Liberty Transit Strategic Planning Study.

The transit service that began in October 2010 increases the mobility options of target populations, with near public and low income housing as well as several human services destinations, and complementary route deviation service for paratransit eligible passengers. This service is complemented by the rural on-demand transportation provided by Coastal Regional Coaches.

HAMPO Process

In order to provide better transportation services to the target populations in the HAMPO planning area, the following actions have been taken:

- Notification of target populations of meetings,
- Membership on HAMPO committees is diverse, and
- Assess all proposed projects and how they might affect different populations.

HAMPO has made a great effort to engage the target population in all plans and programs in the transportation planning process. This is discussed in detail in the public participation plan.

Long Range Transportation Plan and Transportation Improvement Plan Process

In addition to documenting needs of Title VI and EJ populations, impacts of transportation system investments proposed in the MPO's transportation plans are assessed. Furthermore, impacts to target populations are included in the LRTP and TIP project prioritization process. Geographic Information Systems are used to overlay target population locations and human services with proposed improvements. Transportation improvements resulting in greater mobility and accessibility for target populations are given positive scores that contribute to a higher ranking in the improvement program.

The following LRTP project scoring criteria relate specifically to principles of Environmental Justice and compliance with Title VI.:

- Does the project impact an environmental justice area?
- Does the project address an issue raised during public comment?
- Is the project consistent with adopted Comprehensive Plan(s)?
- Does the project improve access for the transportation disadvantaged?

As stated in the plan document,

The recommendations of the 2035 Sustainable Mobility Plan are compliant with the following principles of Environmental Justice:

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

Language Implementation Plan (LEP Plan)

In order to ensure meaningful access to limited English proficient population and therefore ensure nondiscrimination based on national origin, HAMPO takes the following steps:

- HAMPO translates vital documents into Spanish.
- Spanish speaking customer service representatives are available for public transportation systems in the area.
- Strives to maintain a friendly and accessible open door policy for all constituents.

Possible Mitigation Strategies

At this time, there appear to be proportionate impacts in the study area.

There are various strategies to move traffic more efficiently, be it highway, transit, or other modes. With regards to environmental justice, there are generally four mitigation strategies, including avoidance of projects, minimize the impacts, mitigation strategies for unavoidable impacts, and offsetting enhancements. In the HAMPO planning area, these strategies are all explored. The HAMPO target areas include the majority of the study area, and almost all of the developed areas.

Development of increased public transportation options as part of the multimodal system is another mitigation strategy. The Hinesville area is fortunate to have some bicycle and pedestrian facilities; and HAMPO will continue to explore & expand this area. Additionally, the fixed route and route deviation public transportation in the target area increase mobility options for target populations without creating burdens. Similarly, the rural on-demand transit service is a benefit for target populations.

Overall Findings, Conclusions, and Recommendations

For the most part, the proposed projects will not be infringing on either non-target or target areas. The new construction of projects will mainly take place in rural, undeveloped, areas and will affect that population very little.

There are concerns with the construction of the “Hinesville By-pass” because of its proximity to an area called “Holmestown”. This is a historic African American community that has remained intact for generations. The county is working very closely with the road construction engineer to make sure that the community impacts will be proportional to overall project impacts.

The widening and safety projects identified in our LRTP generally will not impact the identified EJ areas disproportionately. In some cases the purchase of road right-of-way may displace some people in the EJ category, but it will also impact non-EJ individuals as well. In most cases the right-of-way needed is only an additional 30-40 feet, and this may or may not impact residents on either side of the corridor, depending on how the structure on the property is positioned.

To improve highway traffic flow in this area, management strategies (signal coordination and synchronization, etc.) and investments such as intelligent traffic systems will be applied. In addition, a large percentage of the highway maintenance funds will be invested in the target areas.

Overall, there appear to be no disproportionate burdens to the minority and low-income populations in the target area.

END

Appendix A: Title VI Notice to the Public

Hinesville Area Metropolitan Planning Organization (HAMPO) Title VI Notice to Public

Hinesville Area Metropolitan Planning Organization (HAMPO) gives public notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall, on the grounds of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which HAMPO receives Federal financial assistance.

To request a copy of the HAMPO's Title VI program contact HAMPO. To request copies of the program in an alternative format in accordance with Americans with Disabilities (ADA) and Limited English Proficiency (LEP) regulations, please contact HAMPO staff. HAMPO offers a variety of services which include but are not limited to the following; oral interpreters, written language services and translations of vital documents.

Any person who believes that he or she has, individually, or as a member of any specific class of persons, has been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination under any Hinesville Area Metropolitan Planning Organization (HAMPO) service, program or activity, and believes the discrimination is based upon race, color, national origin, gender, age, economic status or limited english proficiency has the right to file a formal complaint. The complaint resolution procedure and complaint form are available at HAMPO's Office at 100 Main Street, Hinesville, GA 31313 or can be downloaded at www.thelcpc.org by clicking on the HAMPO tab and then the document. Both formal and informal complaint procedures are available.

Complaints can be accepted in writing or verbally and are addressed to HAMPO's Executive Director, 100 Main Street, Hinesville, GA 31313 or call HAMPO at 912-408-2030. The signed written complaint must be submitted within 120 days of the alleged discriminatory act or its latest occurrence. Individuals may also file complaints directly with the U.S. Department of Transportation (USDOT), and/or the Federal Transit Administration (FTA) and/or the Federal Highway Administration (FHWA) within the 120 day timeframe.

Appendix B: Complaint Resolution Procedure

Appendix C: Public Participation Plan