

## **Background**

The Champlain Parkway is being developed by the City of Burlington in cooperation with the Federal Highway Administration (FHWA) and the Vermont Agency of Transportation (VTrans). This memo describes the preliminary Environmental Justice (EJ) analysis and methodology and provides a portion of the 2019 update to the EJ analysis for the project. This review conforms with Executive Order 12898 and the requirements and guidance issued by FHWA which includes, but is not limited to, the December 2011 FHWA Memorandum regarding guidance on Environmental Justice and NEPA and the 2012 FHWA Order 6640.23A.

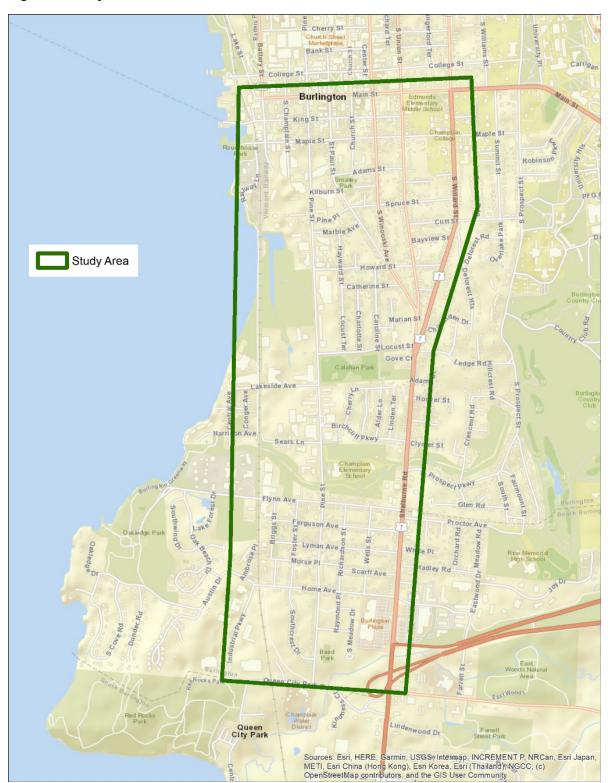
"Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, signed by the President on February 11, 1994 directs Federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of Federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law."

This step of the EJ assessment is to collect demographic data and identify existing minority and/or low-income populations that may be affected by the project.

## **Study Area**

The limits of the study area for this analysis match the study area identified in the Southern Connector/Champlain Parkway NEPA documents (see Figure 1). Though the traffic operations analysis separates the study area into primary and secondary areas, this analysis looks at the study area as a whole. All communities within the study area will be impacted by the project, so it is more appropriate to consider the whole study area.

Figure 1: Study Area



## **EJ Analysis Methodology**

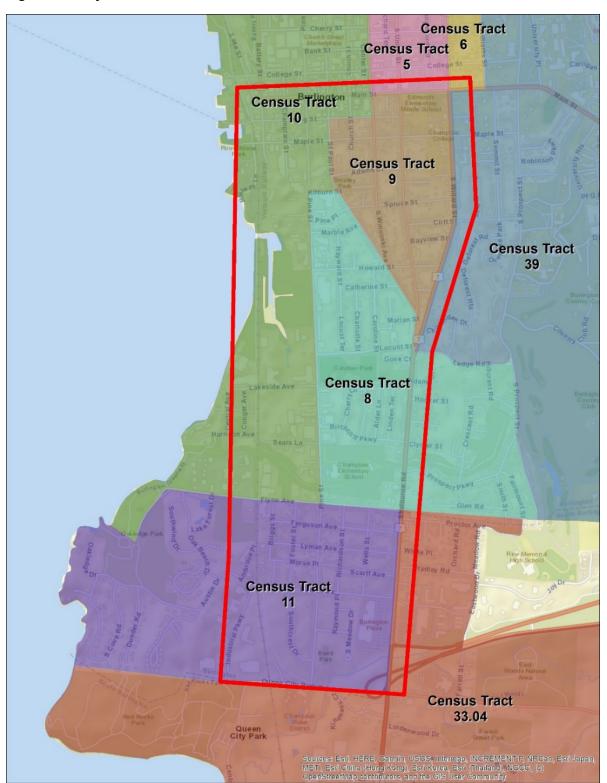
American Community Survey<sup>1</sup> (ACS) 2014-2018 5-Year Estimates were used to identify minority communities. The ACS 5-Year Estimates for household income were compared to the Health and Human Services (HHS) guidelines to identify low-income communities.

The demographics of Burlington have been changing and the data from the 2010 Census is nine years old, so the ACS data provides the most recent and reliable data at the census tract level. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. As seen on Figure 2, eight census tracts are fully or partially within the study area: Census Tract 5, Census Tract 6, Census Tract 8, Census Tract 9, Census Tract 10, Census Tract 11, Census Tract 33.04, and Census Tract 39. The majority of the Study Area is within Census Tracts 8, 9, 10, and 11.

The Environmental Protection Agency (EPA) has developed EJSCREEN, an online environmental justice mapping and screening tool. Though this tool is valuable in identifying locations that may necessitate further review, it does not capture all relevant information, data may be several years old, and available data has substantial uncertainty in demographic and environmental estimates, particularly when reviewing small geographic areas. Therefore, EPA recommends that information from EJSCREEN be supplemented by other information, including updated datasets when available. EJSCREEN was used for several initial reviews. Since EJSCREEN is utilizing the 2012-2016 ACS 5-year estimates, 2014-2018 ACS 5-year estimates were obtained from the Census Bureau's Data Platform (data.census.gov) to ensure that the most recent available data was utilized in this review.

<sup>&</sup>lt;sup>1</sup> The ACS is an ongoing survey conducted by the Census Bureau between the decennial census. "It is a nationwide, continuous survey designed to provide communities with reliable and timely social, economic, housing, and demographic data every year." (ACS Information Guide: <a href="https://www.census.gov/content/dam/Census/programs-surveys/acs/about/ACS">https://www.census.gov/content/dam/Census/programs-surveys/acs/about/ACS</a> Information Guide.pdf)

**Figure 2: Study Area Census Tracts** 



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Reference: Champlain Parkway Environmental Justice Analysis Progress Memo

# **Minority Populations**

For the purposes of EJ, FHWA defines minority populations as: Black, African-American or of African descent, of Hispanic or Latino origin, Asian-American, American Indian, Alaskan Native, Native Hawaiian, or Pacific Islander. The percentage of minority communities in the Burlington City area and in study area census tracks is shown on Figure 3.

Each census tract within the study area has at least one minority population that exceeds the city average for that population (Table 1). There is a minority community in Census Tract 10. The City of Burlington is 17.1% minority while Census Tract 10 is 18.1% minority. There are additional block groups (in Census Tracts 8 and 33.04) where the total minority population also exceeds that of the City of Burlington, however the census tracts themselves are less diverse than the City. The residential portion of Census Tract 10 that is within the study area is part of the Maple and King neighborhood.

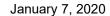




Table 1: Race and Ethnicity (2018)

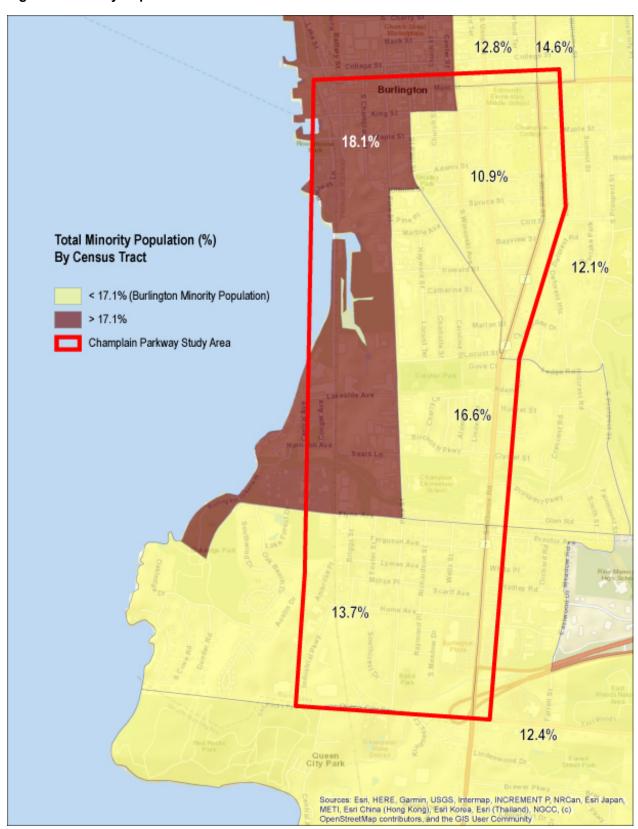
Geography	TOTAL MINORITY*	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some Other Race	Two or More Races	Hispanic or Latino
Census Tract 5	12.8%	7.5%	0.0%	1.8%	0.2%	0.0%	1.7%	2.7%
Block Group 3	10.8%	4.0%	0.0%	1.9%	0.4%	0.0%	3.2%	3.0%
Census Tract 6	14.6%	5.2%	0.1%	4.6%	0.0%	0.5%	1.6%	3.1%
Block Group 2	10.7%	0.0%	0.2%	8.5%	0.0%	0.0%	0.9%	1.3%
Census Tract 8	16.6%	2.9%	0.4%	10.7%	0.0%	0.4%	1.1%	1.6%
Block Group 1	19.8%	3.8%	0.0%	12.5%	0.0%	0.5%	1.4%	2.1%
Block Group 2	6.8%	0.0%	1.7%	5.1%	0.0%	0.0%	0.0%	0.0%
Census Tract 9	10.9%	1.2%	0.0%	4.3%	0.0%	0.1%	4.5%	1.4%
Block Group 1	13.2%	1.6%	0.0%	2.3%	0.0%	0.3%	6.6%	2.8%
Block Group 2	2.6%	0.0%	0.0%	0.0%	0.0%	0.0%	2.6%	0.0%
Block Group 3	15.6%	1.6%	0.0%	10.3%	0.0%	0.0%	3.6%	1.0%
Census Tract 10	18.1%	8.8%	1.5%	1.8%	0.0%	0.0%	2.0%	4.1%
Block Group 1	19.1%	7.4%	0.6%	2.4%	0.0%	0.0%	2.7%	6.0%
Block Group 2	16.7%	10.8%	2.8%	1.0%	0.0%	0.0%	1.0%	1.3%
Census Tract 11	13.7%	3.4%	1.5%	2.1%	0.0%	0.9%	4.2%	2.1%
Block Group 1	17.1%	5.5%	2.4%	0.8%	0.0%	0.0%	5.9%	3.3%
Block Group 2	8.0%	0.0%	0.0%	4.4%	0.0%	2.4%	1.2%	0.0%
Census Tract 33.04	12.4%	1.3%	1.0%	5.4%	0.0%	0.6%	2.5%	2.2%
Block Group 1	19.9%	1.0%	2.8%	11.6%	0.0%	1.1%	2.6%	1.9%
Census Tract 39	12.1%	1.7%	0.1%	4.8%	0.1%	0.5%	2.1%	3.8%
Block Group 1	8.4%	2.0%	0.0%	0.3%	0.3%	0.5%	1.2%	6.1%
Burlington City	17.1%	5.3%	0.3%	6.4%	0.0%	0.3%	2.7%	2.8%
Chittenden County	11.2%	2.5%	0.3%	4.2%	0.0%	0.6%	2.0%	2.3%

Source: US Census Bureau, American Community Survey 2018 5-Year Estimates (Tables B02001 and B03002)

<sup>\*</sup> Total Minority: Sum of each of the protected races (Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Pacific Islander, Some Other Race, Two or More Races) and White Alone Hispanic or Latino.



**Figure 3: Minority Population** 



### **Data Comparison**

Since the 2000 Census, Burlington has become increasingly diverse. In the 2000 Census and 2009 5-Year ACS, 9.2% of the City's population reported a minority race or ethnicity. By the 2018 ACS, that percentage had increased to 17.1%. Census Tracts 8 and 10 had the largest increase, both increased their minority population by 9.7% between 2000 and 2018.

**Table 2: Race and Ethnicity Over Time** 

Geography	2000 Total Minority	2009 Total Minority	2018 Total Minority	INCREASE OVER TIME	
Census Tract 5	7.7%	7.0%	12.8%	5.1%	
Census Tract 6	8.4%	6.1%	14.6%	6.2%	
Census Tract 8	6.9%	7.7%	16.6%	9.7%	
Census Tract 9	6.7%	11.8%	10.9%	4.2%	
Census Tract 10	8.4%	8.6%	18.1%	9.7%	
Census Tract 11	13.9%	11.6%	13.7%	-0.2%	
Census Tract 33.04 (formerly a portion of Census Tract 33)	6%	16.2%	12.4%	6.4%	
Census Tract 39 (Formerly Census Tract 7)	7.4%	10.5%	12.1%	4.7%	
Burlington City	9.2%	9.2%	17.1%	7.9%	
Chittenden County	5.9%	8.4%	11.2%	5.3%	

Source: US Census Bureau, American Community Survey 2018 5-Year Estimates (Tables B02001), US Census Bureau, American Community Survey 2009 5-Year Estimates (Table B02001), and US Census Bureau, Census 2000 Summary File 1 (Table DP-1)

### **Low-Income Populations**

To identify low-income communities, the United States Department of Transportation (DOT) and the Federal Highway Administration (FHWA) use the Department of Health and Human Services (HHS) poverty guidelines. Based on these guidelines, none of the study area census tracts meet the criteria for low-income populations.

None of the census tracts in the study area meet the HHS poverty guidelines (see Table 4), so they are not considered low-income communities for FHWA EJ analyses. For reference, the 2018 5-Year ACS data is provided in Table 5.

There is a homeless encampment on Sears Lane on a parcel the City purchased as right-of-way for this project. In the Fall of 2019, the number of trailers at this location varied. There appeared to be between one and four trailers at different times through the fall. Supportive services (including lodging) are available to the encampment's residents and there is capacity at local and regional facilities to support this population. As this project is developed, it is most likely that the people using this encampment will utilize the available lodging and/or other supportive services or move to another encampment in the city.

Table 3: Median Household Income by Household Size (2018)

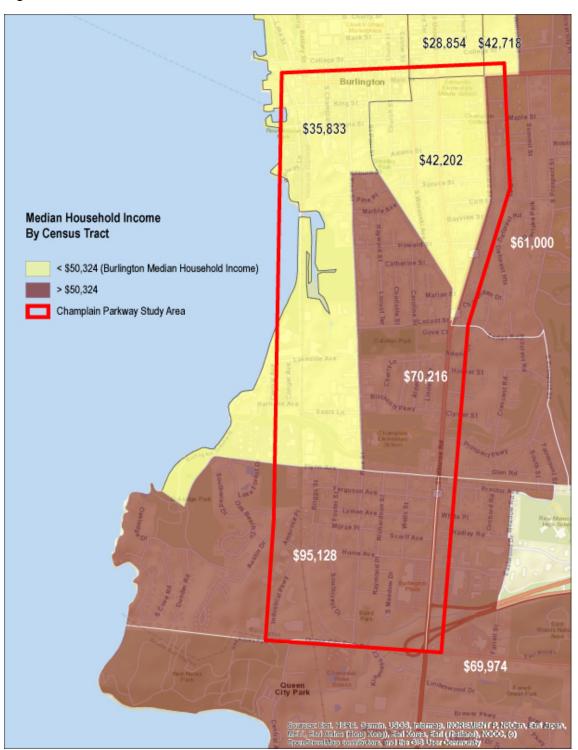
	Median	Household Size							
Geography	Household Income	1 Person	2 People	3 People	4 People	5 People	6 People	7+ People	
Census Tract 5	\$28,854	\$15,889	\$36,473	-	-	\$41,250	-	-	
Census Tract 6	\$42,718	\$25,580	\$44,500	-	\$70,476	\$71,210	-	-	
Census Tract 8	\$70,216	\$44,444	\$73,214	\$126,806	\$108,750	\$134,844	-	-	
Census Tract 9	\$42,202	\$23,523	\$64,715	-	\$83,832	-	-	-	
Census Tract 10	\$35,833	\$19,457	\$78,450	\$139,438	-	-	-	-	
Census Tract 11	\$95,128	\$65,677	\$99,271	\$93,750	\$116,563	\$250,000 +	-	-	
Census Tract 33.04	\$69,974	\$42,167	\$81,641	\$84,000	\$141,500	-	-	-	
Census Tract 39	\$61,000	\$38,750	\$110,156	-	\$82,917	-	-	=	
Burlington City	\$50,324	\$27,255	\$63,780	\$70,192	\$64,767	\$72,242	\$63,155	\$89,524	
Chittenden County	\$69,896	\$36,686	\$78,884	\$91,539	\$110,571	\$111,696	\$88,092	\$89,940	
2018 HHS Poverty Guidelines	n/a	\$12,140	\$16,460	\$20,780	\$25,100	\$29,420	\$33,740	\$38,060*	

<sup>\*</sup> For households with more than 7 people, add \$4,320 for each additional person.

### **Data Comparison**

In 2010, the first year median household income by household size became available from the Census Bureau, only one study area census tract (Census Tract 5) had household median incomes lower than the HHS threshold at the time. Four- and five-person households in Census Tract 5 had household median incomes lower than the HHS thresholds, but the margin of error is astronomical since there were so few households in that category. Prior to 2010, household median income by household size was not available from the Census Burearu.

Figure 4: Median Household Income



### Conclusion

To identify low-income communities, FHWA recommends using the HHS poverty guidelines. Based on these guidelines, none of the study area census tracts meet the criteria for low-income populations.

Based on the most recent ACS 5-year estimates, Census Tract 10 appears to be a minority population given the higher percentage of minority residents than the city or county. The residential portion of this census tract that is within the study area comprises much of the Maple and King Street neighborhood.

Based on the above analysis, the Project Team has proceeded with outreach to the Maple and King Street neighborhood to assist with further identifying project issues. Targeted outreach to other neighborhoods is not necessary under FHWA EJ procedures since no other low-income or minority populations within the Project Area were identified.

The Project Team is proceeding with the EJ analysis and outreach and held a public meeting on September 26<sup>th</sup>. In preparation for the meeting, City of Burlington staff members had the meeting announcement translated into languages known to be spoken by minority residents of the Maple-King Street neighborhood including: Bhutanese-Nepali, Swahili, Somali (Mai-Mai), Burmese, and French. Fliers were mailed directly to residents in the Maple and King Street Neighborhood, and City staff went door-to-door in the neighborhood distributing fliers. The meeting was hosted at City Hall, a well-known public landmark that is ADA Accessible and within walking distance of the Maple and King Street Neighborhood. City staff has coordinated with the King Street Center, a popular local organization, to help identify and connect with EJ populations in the study area. In addition to providing the meeting announcement in multiple languages, interpreter services were available at the public meeting in the languages identified by the City. Interpretation for other languages was available upon request.