

# Environmental Analysis

## Social Environment – Communities

- Overview
- Defined Communities
- Community Resources
- Relocation Potential
- Environmental Justice

### OVERVIEW

For all projects, the Environmental Analyst must assess the impact to the Social Environment. Communities are important features of the Social Environment. Through the project’s development, the Environmental Analyst must define surrounding communities, identify community resources, consider relocations of community members, and evaluate the project’s impact to low-income and minority communities. The Environmental Analyst must also work with the project team to engage communities through public involvement, include community impacts in the decision-making process, and document the project’s potential to impact communities. Table 1 identifies where communities and related topics fall in the Environmental Analyst’s environmental documentation. Other Social Environment topics are discussed in a separate guidebook.

Table 1 – Communities and Related Topics in Environmental Documentation

Community-related Topic	Programmatic Exclusion (PCE) Discussions	Categorical Exclusion (CE) Template Sections	Environ. Assessment (EA) and Environ. Impact Statement (EIS) Sections*
Defined Communities	- Community Impacts	- Land Use Changes (A.1)	- Land Use (III.B.1)
Relocation Potential	<i>Not Applicable**</i>	- Relocation Potential (A.3)	- Relocations (III.B.3)
Community Resources	- Churches and Institutions - Traffic Disruptions - Detours	- Churches, Cemeteries, and Institutions (A.4) - Parks, Rec Areas, and Wildlife Refuges (A.5)	- Churches and Institutions (III.B.5) - Parklands/Rec Areas/Wildlife Refuges (III.B.4)
Environmental Justice	- Low Income and Minority Communities	- Communities and Title VI/EO 12892 (A.2)	- Communities/Environ. Justice (III.B.4)

\*EA and EIS templates are flexible and the section headings and numbers may change as needed.

Note: Public Involvement and Public Controversy related to the project’s impact to communities and related topics may apply to all topics for all environmental document types.

\*\*A project cannot be processed with a PCE if relocations are needed

## DEFINED COMMUNITIES

Communities are the distinct populated areas along a project corridor. They are defined as groups of people living in close proximity (neighborhoods, subdivisions, apartments, and mobile home parks) or groups that make their presence known through public involvement. Except for projects with low potential for adverse impacts, the decision-making process includes community engagement through public involvement and an evaluation of the project's potential to impacts surrounding communities.

### Identification

The Environmental Analyst identifies communities and defines their characteristics in several ways:

- > Desktop review of the project corridor, including census data;
- > Field visits to the corridor and observations of businesses catering to specific demographics or languages;
- > Early Coordination with local leaders (such as community center volunteers, community association members, religious leaders); and
- > Public Involvement activities, such as open houses, stakeholder meetings, and citizen advisory committees.

Some characteristics to consider when defining communities include:

- > Geographic area and population size;
- > Predominance of elderly/handicapped persons;
- > Community cohesion, the extent that the community has a common sense of belonging and cultural similarity (this information can be gathered through public involvement);
- > Community isolation, the extent that the community is set apart from surrounding communities;
- > Economic factors, such as a large employer in the area;
- > Dependence on community resources (see Community Resources discussion).
- > Residential and commercial displacements (see Relocation Potential discussion); and
- > Proportion of minority and low-income populations (see Environmental Justice discussion).

Defining communities is an important step when developing the project's Public Involvement Plan (PIP). Once identified and included in the PIP, engaging communities through public involvement is an important step in identifying the community characteristics and evaluating the project's potential to impact the community.

### Evaluation

Following identification, the Environmental Analyst evaluates how a community may be impacted by the proposed project. The community's characteristics factor into how potential project impacts are evaluated. Some important questions to consider include:

- > Is the project sensitive to the specific needs of community members, such as handicap access?
- > Will the project split apart a cohesive community?
- > Will the project isolate a community?
- > Will a major employer be displaced or forced to close?
- > Will community members be separated from community resources?
- > Will a large proportion of the community be displaced by the project?
- > Will low-income or minority communities experience disproportionately high and adverse impacts from the project?
- > Will the community be affected by noise, visual, or other disruptions to the human environment resulting from the project? Results from environmental technical studies are used to assess these impacts.

Lastly, the evaluation should consider the results of public involvement activities. By engaging the public, the project team may be able to determine potential impacts, develop solutions to avoid or mitigate those impacts, or communicate with concerned community members to address areas of controversy associated with the proposed project.

### Documentation

If the project is a federal-aid project, then defined communities must be discussed in the environmental document. If no communities are present, then efforts to identify communities (particularly the field survey) must be discussed. If the project has the potential to impact these communities then the project has "involvement" with communities. For projects with Environmental Impact Statements for environmental documentation, this discussion may be included in a separate analysis called a Community Impact Assessment. For other environmental documents, community impacts should be discussed in an effects evaluation. These discussions should identify the communities, discuss how the project affects them (if applicable), and discuss efforts to avoid, minimize, and mitigate these impacts.

## COMMUNITY RESOURCES

Community resources generally refer to facilities or properties along the project corridor used by the community, whether publicly- or privately-owned. Except for projects with low potential for adverse impacts, the decision-making process for all GDOT projects includes consideration of impacts to community resources.

### Identification

The Environmental Analyst identifies community resources using the same methods that help identify defined communities: desktop review, field visit, early coordination, and public involvement. Community resources fall into several different categories detailed below.

#### Public Services

Public services include public safety resources (police station, fire station), hospitals, post offices, schools, colleges and technical schools, and daycare facilities.

#### Places of Worship

These are churches, synagogues, mosques, temples, and other places where congregations gather for religious services and activities.

#### Cemeteries

Cemeteries, whether publicly- or privately-owned, are unique institutions with specific regulations that standardize their protection and care.

The Environmental Analyst should also be aware that cemeteries have considerations relevant to the Cultural Resources section. For example, any cemetery within the project's area of potential effect—regardless of age—must be archaeologically delineated to ensure compliance with Georgia's Abandoned Cemeteries and Burial Grounds Act. Additionally, all cemeteries must be delineated by an Archaeologist as Environmentally Sensitive Areas. Cemeteries with burials 50 years old or older may also be evaluated by the Cultural Resources section for the National Register of Historic Places.

#### Public Parks, Recreation Areas, Wildlife and Waterfowl Refuges

Community resources may also include public parks, recreation areas, and wildlife and waterfowl refuges. For federal-aid projects, land use changes to these resources are regulated by Section 4(f) of the US Department of Transportation Act of 1966. Additionally, protections related to Section 6(f) of the Land and Water Conservation Fund (LWCF) Act of 1965 apply to all projects that cause impacts to all facilities acquired or developed with LWCF federal funding.

### Evaluation

Evaluation of community resources varies because the functions and services provided by these resources vary. Through coordination with officials and public involvement, the Environmental Analyst may determine how the proposed project impacts these functions

and services. The most common impacts are temporary impacts during construction, changes to access to the resources, and right of way/easement requirements. By engaging with the officials responsible for the resource, the project team may be able to avoid or mitigate impacts associated with the proposed project. Community resources will also be evaluated through the Avoidance and Minimization Measures Meeting (A3M) and subsequent efforts to avoid and minimize impacts to these resources.

### Documentation

If the project is a federal-aid project, then impacts to community resources (if present) must be discussed in the environmental document. If the project has the potential to impact these community resources, then the project has “involvement” with community resources. Community resource impacts are discussed in the effects evaluation of the document. This discussion should identify the resources, discuss how the project affects them, and discuss efforts to avoid, minimize, and mitigate impacts.

## RELOCATION POTENTIAL

Any project that displaces residents or businesses has relocation potential. Relocation potential factors into the evaluation of community impacts because displaced residents and businesses may be community members and displacements could affect community cohesion. Also projects may displace important community resources, such as public services, which require special consideration. For projects with one or more displacements, evaluation of this relocation potential is conducted through a Conceptual Stage Study (CSS).

### Conceptual Stage Study

The CSS evaluates the relocations along the project corridor. The Project Manager is responsible for ensuring the completion of the CSS. This is typically initiated when preliminary plans are available for technical studies. The Office of Right of Way (ROW) develops the CSS (if in house) or reviews and approves the CSS (if developed by others). Upon approval, the CSS is shared with OES and the Environmental Analyst. The following information is standard in all CSS documents.

For both residential and commercial displacements, the CSS will detail the number, type (owner- or tenant-occupied), and rental or fair market value of the residence or business structures to be displaced. The type of neighborhood in which the structure is located (residential, commercial, or mixed) will also be noted for all anticipated relocations. For business relocations, the CSS will estimate the number of employees affected and estimate the financial standing of the business. When applicable, the CSS will provide the same information for probable displacements (structures that are likely to be relocated due to impacts such as loss of access).

Additionally, the CSS will include an estimate of the number of handicapped and elderly occupants or employees to be displaced (including elderly people who are not capable of

self-care), It will discuss any special relocation services that may be necessary. If needed, it will focus on the anticipated relocation of any public service within the project area (e.g., a fire station), which will require special attention.

The CSS concludes with discussions of critical topics from the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, such as decent, safe, and sanitary housing; last resort housing; and “In lieu of” payments for businesses. Lastly, the CSS will address each alternative under consideration by GDOT.

### Documentation

If the project is a federal-aid project, then the relocation impacts (if any) must be discussed in the environmental document, and the project has “involvement” with relocation potential. Additionally, because an unredacted CSS contains personal information, the document only includes the CSS approval page as an attachment with a summary of the CSS results in the effects evaluation discussion. The discussion must note the number and type of displacements (residential or commercial) and other relevant information. The discussion will also state that the relocation will be in accordance with the Uniform Relocation Assistance and Real Properties Acquisition Act of 1970 as well as State and Federal Regulations.

## ENVIRONMENTAL JUSTICE

Environmental Justice (EJ) refers to the fair distribution of environmental benefits and burdens, particularly with respect to minority and low-income populations. Consideration of EJ related to transportation projects is required by the following:

- > Title VI of the Civil Rights Act of 1964;
- > National Environmental Policy Act (NEPA);
- > Federal-aid Highway Act of 1970 (23 US Code 109h);
- > Executive Order (EO) 12898;
- > US Department of Transportation (USDOT) Order to “Address Environmental Justice in Minority Populations and Low-income Population” (USDOT Order 5610.2); and
- > Federal Highway Administration (FHWA) Order to “Address Environmental Justice in Minority Populations and Low-income Populations” (FHWA Order 6640.23), December 2,1998.

Under Title VI, “each federal agency is required to ensure that no person, on the grounds of race, color, or national origin, is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance.” Additionally, EO 12898 mandates that “each federal agency identify and address the disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” Because GDOT receives federal financial assistance for its program, any project—including

state-funded and federal-aid projects—must include EJ consideration in the decision-making process.

Many GDOT projects are minor in scope and their potential for adverse impacts to surrounding communities, including EJ communities, is low. Even if adverse impacts to EJ communities is not anticipated, outreach in languages other than English may still be required. EJ identification and evaluation is not required for many minor/low potential projects such as roadway maintenance, pavement rehabilitation, signal upgrades, and safety projects—typically cleared as PCEs. Projects that require EJ identification involve the following:

- > Major widening;
- > Bypasses or other significant new location;
- > Bridge replacements
- > Changes to access;
- > Displacements or significant ROW takes;
- > Significant alteration of traffic patterns;
- > Known potential controversy; and
- > Community isolation or impacts to community cohesion.

### Identification

GDOT identifies EJ populations through four steps: census analysis, consultation, field visits, and public involvement. These steps focus on “readily identifiable” communities of minority or low-income individuals. As noted in the Defined Communities section, communities are defined as groups living in close proximity (neighborhoods, subdivisions, apartments, and mobile home parks) or groups that make their presence known through public involvement. Dispersed residents are considered EJ communities only if they would incur common adverse effects from the project (e.g. experience increased traffic, a similar loss of access due to a median, etc.) or unless they raise common concerns during project development.

### Census Analysis

EJ identification includes US Census Bureau research to determine the presence of minority or low-income populations within the project area. *EJ Screen* and *Census Data Mapper* are two open-access tools from the federal government that can aid EJ identification. Other tools may also be used for this analysis. The research should compare the percentage of minorities and low-income persons in the census block(s) and tract(s) in which the project corridor is located to the corresponding percentages at the county level. In addition, this research should identify the percentage of households with Limited English Proficiency. In

cases where the project is expected to significantly alter traffic patterns, the research should also include block groups and tracts that are expected to experience substantial increases or decreases in traffic. For this research, following FHWA Order 6640.23, *minority* means a person who is Black, Hispanic, Asian American, American Indian, or Alaskan Native, and *low-income* means a person whose house-hold income is at or below the Department of Health and Human Services poverty guidelines.

### Consultation

Consultation is conducted through Early Coordination. Early Coordination (letters or email exchanges) includes a request to local governments, planning authorities, and any readily identifiable community organizations in the project area to provide information about the presence of EJ communities. In addition to local entities, the Environmental Protection Agency is a consulting agency for projects with major EJ concerns or displacements.

### Field Survey

The field survey to identify EJ communities includes an analysis of the project corridor, side streets off the corridor, and any roadways where the project is expected to cause a substantial increase or decrease in traffic. The analysis should identify EJ communities and community resources, such as public services, places of worship, cemeteries, and parks/recreation areas within the project area.

### Public Involvement

Lastly, public involvement is an important step to identify EJ communities. Through public involvement EJ communities may present their concerns by providing feedback on the project and noting communities potentially impacted by the project as presented. The outcome of the other EJ identification steps also informs how the project team should conduct public involvement, particularly if populations with Limited English Proficiency are identified within the project area. In this case, public involvement may require special consideration for these populations, such as interpreters and public involvement advertising and handouts translated to the populations' languages.

### Evaluation

Following identification, the Environmental Analyst evaluates how the EJ communities may be impacted by the proposed project. The evaluation should consider how the communities are affected by changes to access, displacements or significant ROW takes, alterations to traffic patterns, increased community isolation, impacts to community cohesion, or other issues of community concern and controversy. Efforts to avoid and minimize impacts to EJ communities must be considered as part of the A3M.

Next, the evaluation should consider the issue of *disproportionate impacts* to EJ communities. Disproportionate impacts occur if the project creates adverse impacts to the EJ communities while avoiding impacts to other communities more representative of the general population. If the impacts are not disproportionate (meaning they affect general



population communities as much or more than they affect EJ communities), then no further consideration to avoid or minimize impacts is needed.

If the impacts are disproportionately high and adverse, then additional public involvement is needed. This public involvement should be targeted to the EJ community. It should define the community, identify its needs and wishes, and determine the community's views toward the project and its alternatives. It should also identify programs to mitigate impacts from the project. It can be conducted through local minority leaders, religious leaders, and community leaders acting as points of contact.

The USDOT Order states that projects with disproportionately high and adverse impacts to EJ communities may only be carried out if:

1. A substantial need for the program, policy, or activity exists, based on overall public interest; and
2. Alternatives that would have less adverse effects on protected populations (and that still satisfy the need identified above) either
  - i. Would have other adverse social, economic, environmental, or human health impacts that are more severe, or
  - ii. Would involve increased costs of extraordinary magnitude.

The USDOT Order permits a transportation project to proceed even if it would have a disproportionately high and adverse impact to EJ communities, but the Environmental Analyst must work with the project team to prove that conditions (1) and (2) are true.

### Documentation

For all federal-aid projects, the impacts to EJ communities (if present) must be discussed in the environmental document. If the project has the potential to impact these communities, then the project has “involvement” with EJ. GDOT provides templates for these documents that outline the discussion requirements for EJ. In general, the documentation includes the following:

- > A discussion of the steps to identify EJ communities in the project area, including a description of the communities identified;
- > A discussion of the evaluation of impacts to the EJ communities resulting from the proposed project, including a determination of whether those impacts are disproportionately high and adverse; and
- > If the project includes disproportionately high and adverse impacts, include the following:
  - A discussion of public involvement with the EJ community,

- A description of plans to mitigate impacts (if any),
- A reiteration of the need for the project, and
- An analysis of alternatives that would have less of an impact to EJ communities, including other more severe impacts or increased extraordinary costs associated with these alternatives.

For state-funded projects, the District Planning and Programming Engineer completes a Title VI check-list for the project file.

## *Guidebook Revision History*

Revision Description	Relevant Sections	Revision Date
Initial Publication	All	10/16/2020