

Environmental Justice Report - 2008

Prepared by the
Lehigh Valley Planning Commission
for the
Lehigh Valley Transportation Study

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BACKGROUND

Executive Order 12898 of February 11, 1994 *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, states “Each Federal agency shall make 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 and low-income populations.”

Environmental justice builds on the foundation of Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. In 1997, the Department of Transportation (DOT) issued its *Order to Address Environmental Justice in Minority Populations and Low-Income Populations* to summarize and expand upon the requirements of Executive Order 12898 on Environmental Justice.

Environmental justice contains three main objectives:

- 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;
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Environmental justice improves the transportation decision-making process. Its principles, when properly implemented, improve all levels of transportation decision-making by:

- Making better transportation decisions that meet the needs of the people;
- Designing transportation facilities that fit more harmoniously into communities;
- Enhancing the public involvement process, strengthening community-based partnerships, and providing minority and low-income populations with opportunities to learn about and improve the quality and usefulness of transportation in their lives;
- Improving data collection, monitoring, and analysis tools that assess the needs of, and analyze the potential impacts on, minority and low-income populations;
- Partnering with other public and private programs to leverage transportation agency resources to achieve a common vision for communities.

- Avoiding disproportionately high and adverse impacts on minority and low-income populations, and
- Minimizing and/or mitigating unavoidable impacts by identifying concerns early in the planning phase and providing offsetting initiatives and enhancement measures to benefit affected communities and neighborhoods.

ORGANIZATIONAL AFFILIATIONS & ENVIRONMENTAL JUSTICE RESPONSIBILITIES

ORGANIZATIONAL AFFILIATIONS

The Metropolitan Planning Organization (MPO) for Lehigh and Northampton counties is the Lehigh Valley Transportation Study (LVTS). The role of the MPO is to promote transportation projects, plans, programs, and policies that are consistent with the locally adopted Transportation Improvement Program (TIP) and Lehigh Valley Surface Transportation Plan 2007 – 2030 in accordance with the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) and Clean Air Act legislation. LVTS was created in 1964 through a legal agreement between the Cities of Allentown, Bethlehem, and Easton; the Counties of Lehigh and Northampton; and the Department of Highways of the Commonwealth of Pennsylvania (now the Pennsylvania Department of Transportation). The LVTS was founded in response to the Federal-Aid Highway Act of 1962, which stated, in part, that any urban area with a population of more than 50,000 must maintain a continuing, comprehensive and cooperative transportation planning process consistent with the comprehensively planned development of the urbanized area in order to be eligible to receive Federal funds for transportation projects. LVTS satisfies this planning requirement and assures the region continued eligibility to receive state and federal funding for highway and transit system capital improvements and operating assistance.

LVTS is made up of two committees – the Technical Committee and Coordinating Committee. The Technical Committee reviews items brought before the group and recommends actions to the Coordinating Committee. The Coordinating Committee is the policy body which formally adopts items reviewed by the Technical Committee. LVTS Technical Committee membership consists of representatives from PennDOT Central Office, PennDOT District 5-0, Allentown, Bethlehem, Easton, Lehigh Valley Planning Commission (LVPC), Lehigh and Northampton Transportation Authority (LANTA), and the Lehigh-Northampton Airport Authority (LNAA). The Coordinating Committee membership consists of representatives from PennDOT Central Office, PennDOT District 5-0, Lehigh County, Northampton County, Allentown, Bethlehem, Easton, LVPC, LANTA, and LNAA.

The transportation planning staff of the LVPC serves as technical staff for the LVTS, preparing plans and programs for MPO consideration. The LVPC consists of 37 members comprised of 19 elected officials (mayors, county executives, members of the Lehigh County Board of Commissioners, members of Northampton County Council, and representatives of Boroughs and townships) and 18 citizen members. The LVPC and LVTS jurisdictions include 62 municipalities in Lehigh and Northampton counties in the central eastern portion of the Commonwealth of Pennsylvania. The region encompasses 731 square miles and is home to 579,156 persons according to the 2000 Census.

ENVIRONMENTAL JUSTICE RESPONSIBILITIES

Metropolitan Planning Organizations and EJ

Recipients and sub-recipients of Federal funds, such as the Lehigh Valley Transportation Study (LVTS), the Metropolitan Planning Organization (MPO) for the Lehigh Valley, are required to address Title VI and environmental justice in their various plans, programs, and projects. MPOs serve as the primary forum where State DOTs, transit providers, local agencies, and the public develop local transportation plans and programs that address a metropolitan area's needs. To certify compliance with Title VI and environmental justice, MPOs need to:

- Enhance their analytical capabilities to ensure that the long-range transportation plan and the transportation improvement program (TIP) comply;
- 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 investments can be fairly distributed.
- Evaluate and, where necessary, improve their public involvement processes to eliminate participation barriers and engage minority and low-income populations in transportation decision-making.

Public Transportation Providers and EJ

Public transportation providers offer mobility for citizens regardless of vehicle ownership. They provide an essential service for many who have no other way to get to work, shopping, child care, medical appointments, recreation, or other destinations. Transit agencies support Title VI and environmental justice when they:

- Ensure that new investments and changes in transit facilities, services, maintenance and vehicle replacement deliver equitable levels of service and benefits to low-income and minority populations;
- Avoid, minimize or mitigate disproportionately high and adverse effects on minority and low-income populations;
- Enhance public involvement activities to identify and address the needs of minority and low-income populations in making transportation decisions.

State Departments of Transportation and EJ

State DOTs are at the core of planning, design, construction, and operations and maintenance of projects across all modes of travel. They allocate resources from various Federal-aid programs. State DOTs integrate Title VI and environmental justice into their activities when they:

- Develop the technical capability to assess the benefits and adverse effects of transportation activities among different population groups and use that capability to develop appropriate procedures, goals, and performance measures in all aspects of their mission;
- Ensure that State Transportation Improvement Program (STIP) findings of statewide planning compliance and National Environmental Policy Act (NEPA) activities satisfy the letter and intent of Title VI requirements and environmental justice principles;
- Enhance their public involvement activities to ensure the meaningful participation of minority and low-income populations;

- Work with Federal, State, local, and transit planning partners to create and enhance intermodal systems, and support projects that can improve the natural and human environments for low-income and minority communities.

Federal Transportation Agencies and EJ

FHWA and Federal Transit Administration (FTA) staff will work with State DOTs, MPOs, transit providers, and other local agencies to ensure Title VI and environmental justice considerations are integral to all surface transportation activities. In addition to making sure that Federal transportation regulations and policies affirm and reinforce nondiscrimination, Federal staff will take other important actions to:

- Ensure that Title VI compliance and EJ principles are understood and implemented in metropolitan and statewide planning activities and in NEPA processes and documents;
- Identify effective practices, potential models, and other technical assistance resources to promote the integration of environmental justice into all planning, development, and implementation activities.

General Public and EJ

The active participation of well-informed, empowered individuals, community groups, and other nongovernmental organizations such as businesses and academic institutions are needed if transportation agencies are to fully meet community needs. These individuals and groups advance the letter, spirit, and intent of Title VI and environmental justice in transportation when they:

- Participate in public involvement activities (meetings, hearings, advisory groups, and task forces) to help responsible State and local agencies understand community needs, perceptions, and goals;
- Get involved with State and local agencies to link SAFETEA-LU programs with other Federal, State and local resources to fund projects that support community goals.

ENVIRONMENTAL JUSTICE POPULATIONS/DEFINITIONS

Executive Order 12898 and the DOT and Federal Highway Administration (FHWA) orders on environmental justice address minority and low-income persons. The following groups are considered minority and are defined by these orders as follows:

Black – a person having origins in any of the black racial groups of Africa.

Hispanic – a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

Asian – a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.

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.

Native Hawaiian or Other Pacific Islander – a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Low-income populations are defined as a person whose household income (or in the case of a community or group, whose median household income) is at or below the U.S Department of Health and Human Services poverty guidelines. Poverty guidelines are a version of the federal poverty measure. They are issued each year in the Federal Register by the Department of Health and Human Services and represent a simplification of the poverty thresholds for use for administrative purposes – for instance, determining financial eligibility for certain federal programs. The guidelines are shown below:

TABLE 1

2008 HHS Poverty Guidelines	
Persons in Family or Household	48 Contiguous States and D.C.
1	\$10,400
2	\$14,000
3	\$17,600
4	\$21,200
5	\$24,800
6	\$28,400
7	\$32,000
8	\$35,600
For each additional person, add	\$3,600

Source: U.S. Department of Health & Human Services

In addition, several other terms are pertinent to environmental justice and are shown below along with their definition. The source for these definitions is FHWA actions to address environmental justice in minority populations and low income populations.

Minority Population – any readily identifiable group of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly impacted by a proposed DOT program, policy or activity.

Adverse Impact – the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness or death; air, noise, and water pollution and soil contamination; destruction or disruption of community cohesion or a community’s economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of FHWA programs, policies, or activities.

Disproportionately High and Adverse Effect on Minority and Low-Income Populations – an adverse effect that:

- is predominantly borne by a minority population and/or low-income population; or
- will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority

population and/or non low-income population.

Programs, Policies, and/or Activities – all projects, programs, policies, and activities that affect human health or the environment, and that are undertaken, funded, or approved by FHWA. These include, but are not limited to, permits, licenses, and financial assistance provided by FHWA. Interrelated projects within a system may be considered to be a single project, program, policy, or activity for the purpose of this Order.

Examples of Benefits and Burdens

Benefits – decreased congestion, increased mobility and accessibility, decreased delay, improved safety, improved air quality, increased productivity, improved health, improved welfare, increased security, decreased crime, improved roadway geometry, improved emergency response times, improved community cohesiveness, improved economic climate, employment creation, improved transit amenities, improved environmental controls.

Burdens – see the definition above for adverse impact

METHODOLOGY

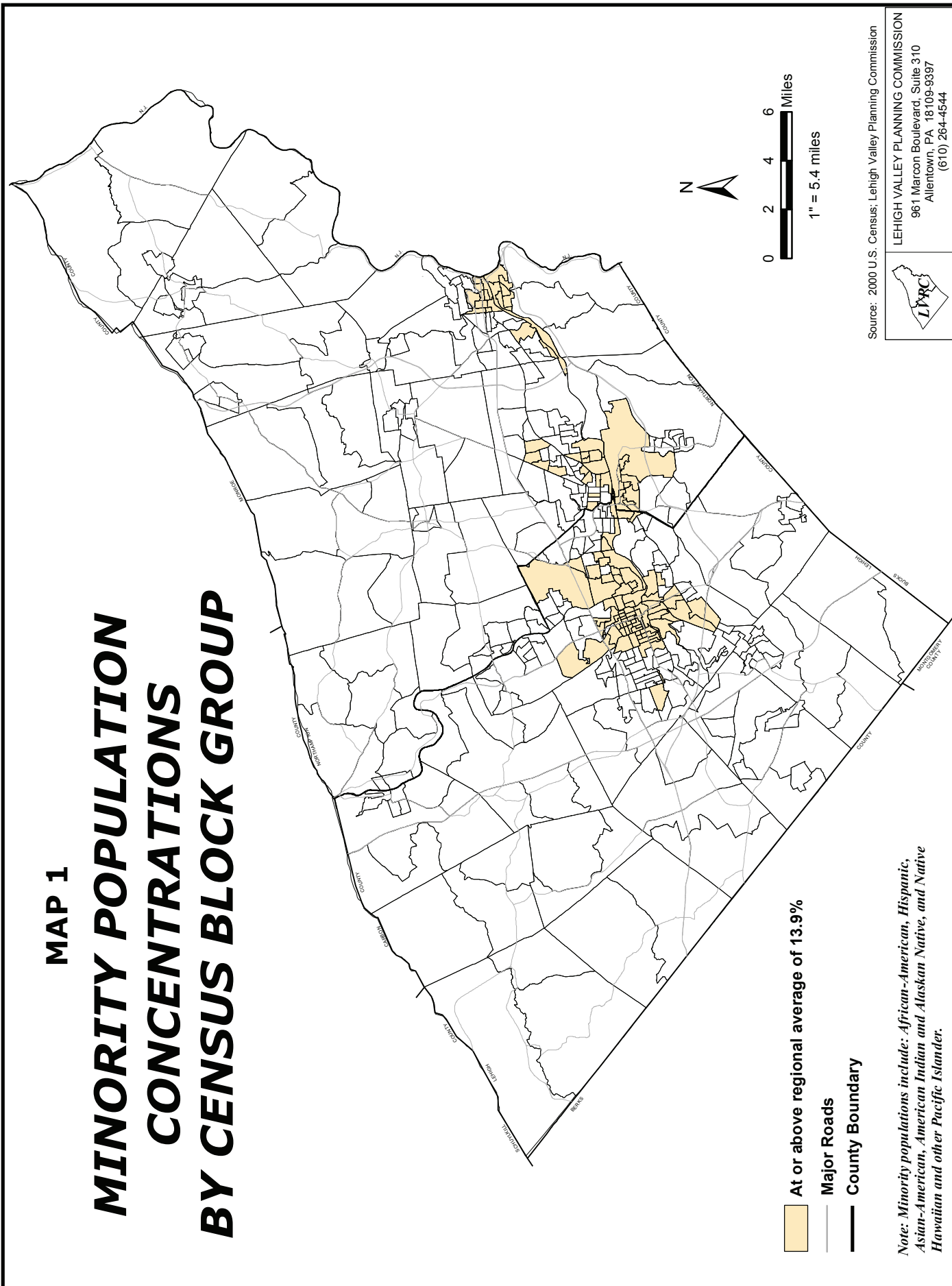
An analysis was conducted to identify burdens and benefits of the Lehigh Valley Surface Transportation Plan 2007 – 2030 (long range transportation plan) and the 2009- 2012 Transportation Improvement Program, as a whole, on minority and low-income populations. These projects, as well as minority and low-income populations, were mapped at the census block group level, which represents the lowest common geographic level among sectors where minority and low-income data is available from the U.S Census.

Map 1 depicts the locations of minority populations by census block group that are at or above the regional average of 13.9%. Most of the minority populations occupy the more urbanized areas of the cities of Allentown, Bethlehem, and Easton. Some concentrations can also be found in a few census block groups in Whitehall Twp., Salisbury Twp., Hanover Twp. (Lehigh County), Bethlehem Twp., Palmer Twp., and the boroughs of Fountain Hill, Freemansburg, and Glendon which are adjacent to the cities.

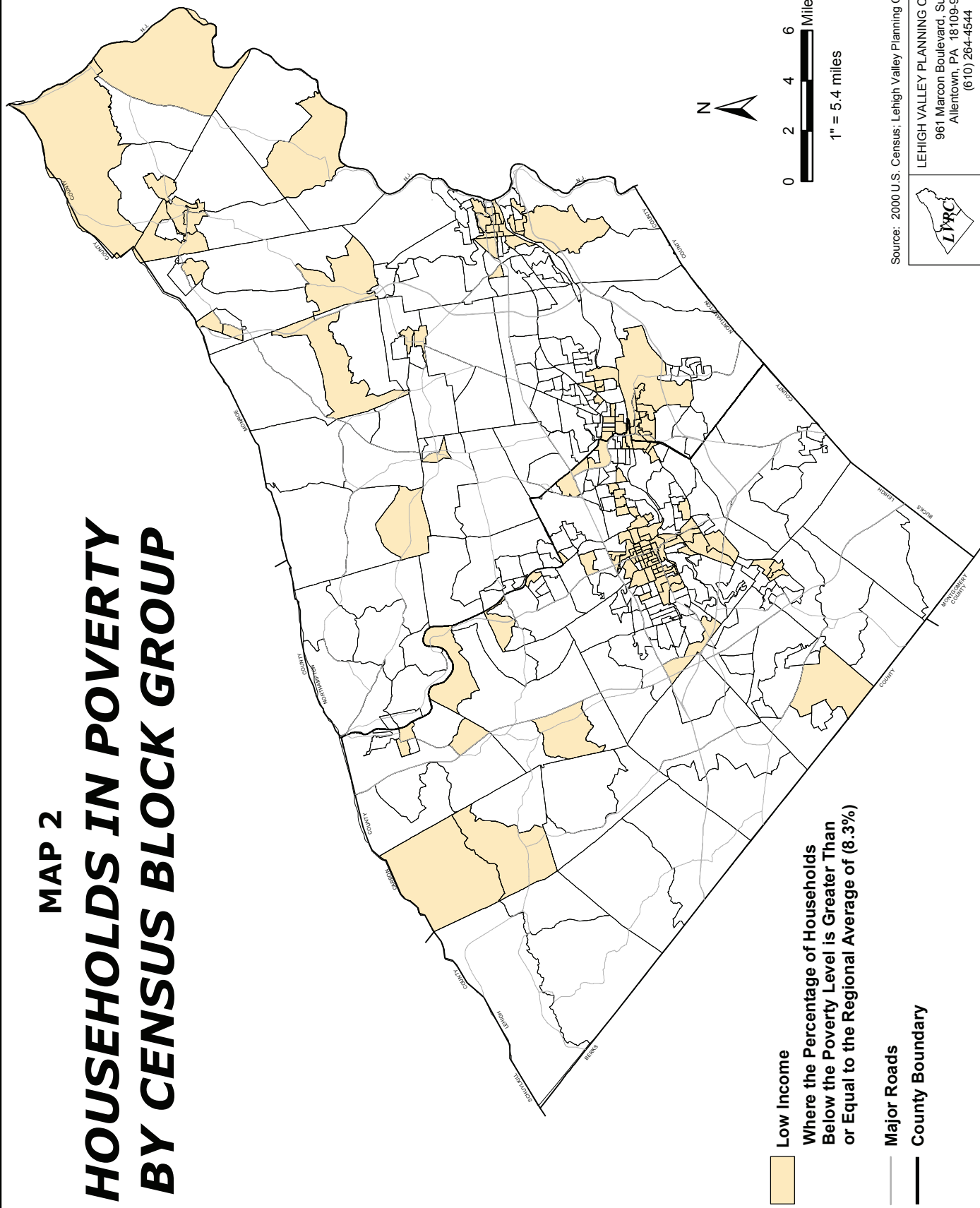
Map 2 depicts households in poverty by census block group where the percentage of households below the poverty level is greater than or equal to the regional average of 8.3%. While low-income households, much like minority populations, occupy portions of the three cities, they tend to be much more dispersed than minority households. They are prevalent in a few census block groups in the outlying suburban and rural townships of Heidelberg, Washington (Lehigh County), North Whitehall, Lower Macungie, South Whitehall, Whitehall, Salisbury, Moore, Bushkill, Plainfield, Washington (Northampton County), Lower Mount Bethel, Upper Mount Bethel, and Williams. In addition, the boroughs of Slatington, Coplay, Emmaus, Fountain Hill, Bath, Freemansburg, Nazareth, Wind Gap, Pen Argyl, Bangor, East Bangor, Portland, Wilson, and West Easton contain low-income populations at or above the regional average.

As previously mentioned, low-income populations are defined as a person whose household income (or in the case of a community or group, whose median household income) is at or below the U.S Department of Health and Human Services poverty guidelines. The guidelines are issued each year by the Department of Health and Human Services.

MAP 1 MINORITY POPULATIONS BY CENSUS BLOCK GROUP



MAP 2 HOUSEHOLDS IN POVERTY BY CENSUS BLOCK GROUP



- Low Income
Where the Percentage of Households
Below the Poverty Level is Greater Than
or Equal to the Regional Average of (8.3%)
- Major Roads
- County Boundary

Source: 2000 U.S. Census; Lehigh Valley Planning Commission

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The third step in the process involved identifying the degree of disadvantage among environmental justice populations. Degrees of disadvantage were measured showing concentrations of disadvantaged populations. Black, Hispanic, Asian, American Indian and Alaskan Native, and Native Hawaiian or other Pacific Islander populations were combined into one grouping while low-income populations constitute a second grouping. Census block groups containing either a minority or low-income population that are greater than the regional average of 13.9% for minorities or 8.3% for low-income are considered to have one degree of disadvantage. Census block groups containing both a minority and low-income population that are greater than their respective regional averages are considered to have two degrees of disadvantage. This approach is utilized to gauge the level of potential impact on both environmental justice groups and appears in Map 3.

The analysis within this report focuses on areas with two degrees of disadvantage since these areas represent the highest concentrations of environmental justice populations. An important distinction must be made with regard to minority population and low-income household data sets. A minority population may or may not also be considered a low-income household. Similarly, a low-income household may or may not be a minority population. The two data sets thus are not mutually exclusive in all instances and consequently some degree of double-counting is inevitable and is noted as a limitation in using these data sets.

TABLE 2

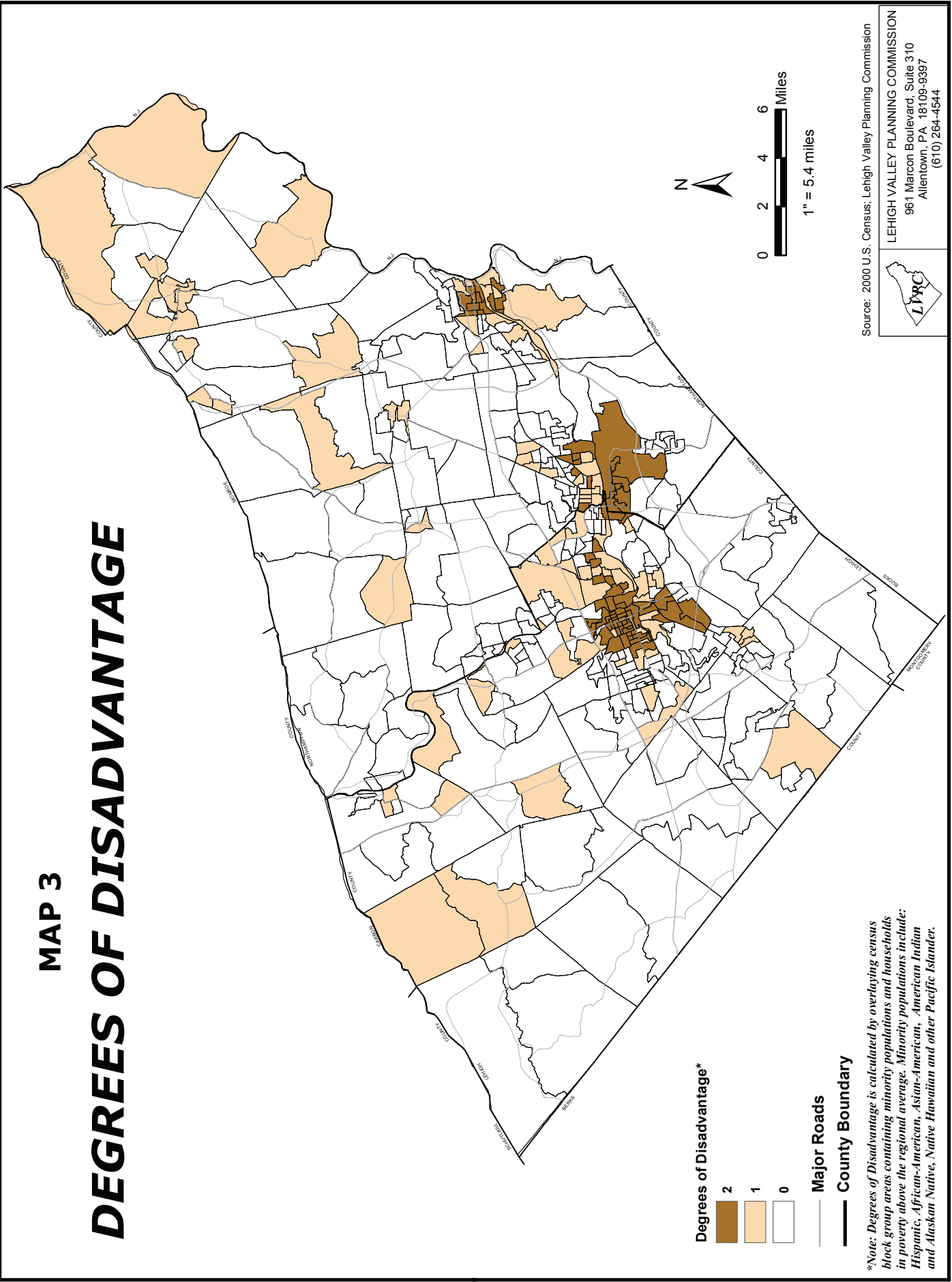
Populations by Municipality in Census Block Groups (CBG) with 2 Degrees of Disadvantage							
Municipality	CBG Total Population	CBG Total Households	Households Below Poverty Level		Minority Population		No. of CBGs
			No.	%	No.	%	
Allentown	67,505	26,312	5,467	21%	30,223	45%	52
Bethlehem (N. Co.)	24,196	8,029	2,213	28%	11,322	47%	18
Bethlehem (L. Co.)	2,216	785	147	19%	1,031	47%	2
Easton	15,944	5,932	1,114	19%	4,732	30%	13
Fountain Hill	2,390	930	123	13%	507	21%	2
Freemansburg	859	319	38	12%	205	24%	1
Whitehall	3,872	1,662	208	13%	1,057	27%	3
Totals	116,982	43,969	9,310	21%	49,077	42%	91

As depicted graphically on Map 3 and Table 2, six municipalities contain census block groups with two degrees of disadvantage. For example, the City of Allentown has a total of 67,505 persons and 26,312 households residing in 52 census block groups with two degrees of disadvantage. 30,223 (45%) of the 67,505 population are minorities. 5,467 (21%) of the 26,312 households are below the poverty level. The cities of Allentown, Bethlehem, and Easton have the largest absolute value of census block group population, census block group households, households below the poverty level, minority population, and census block groups, some of which are a result of more affordable housing costs in these areas. These three cities are followed by Whitehall Township, Fountain Hill, and Freemansburg in terms of absolute numbers.

Map 4 depicts the pairing of degrees of disadvantage, 2009 – 2012 TIP projects, long range transportation plan projects, and the LANTA service area. 156 projects in total were mapped and include highway, bridge, transit, transportation enhancements/hometown streets/safe routes to school projects. Table 3 depicts these 156 projects as it relates to the degrees of disadvantage. Projects are depicted on Table 3 and Map 4.

MAP 3

DEGREES OF DISADVANTAGE



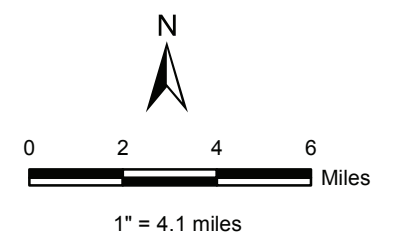
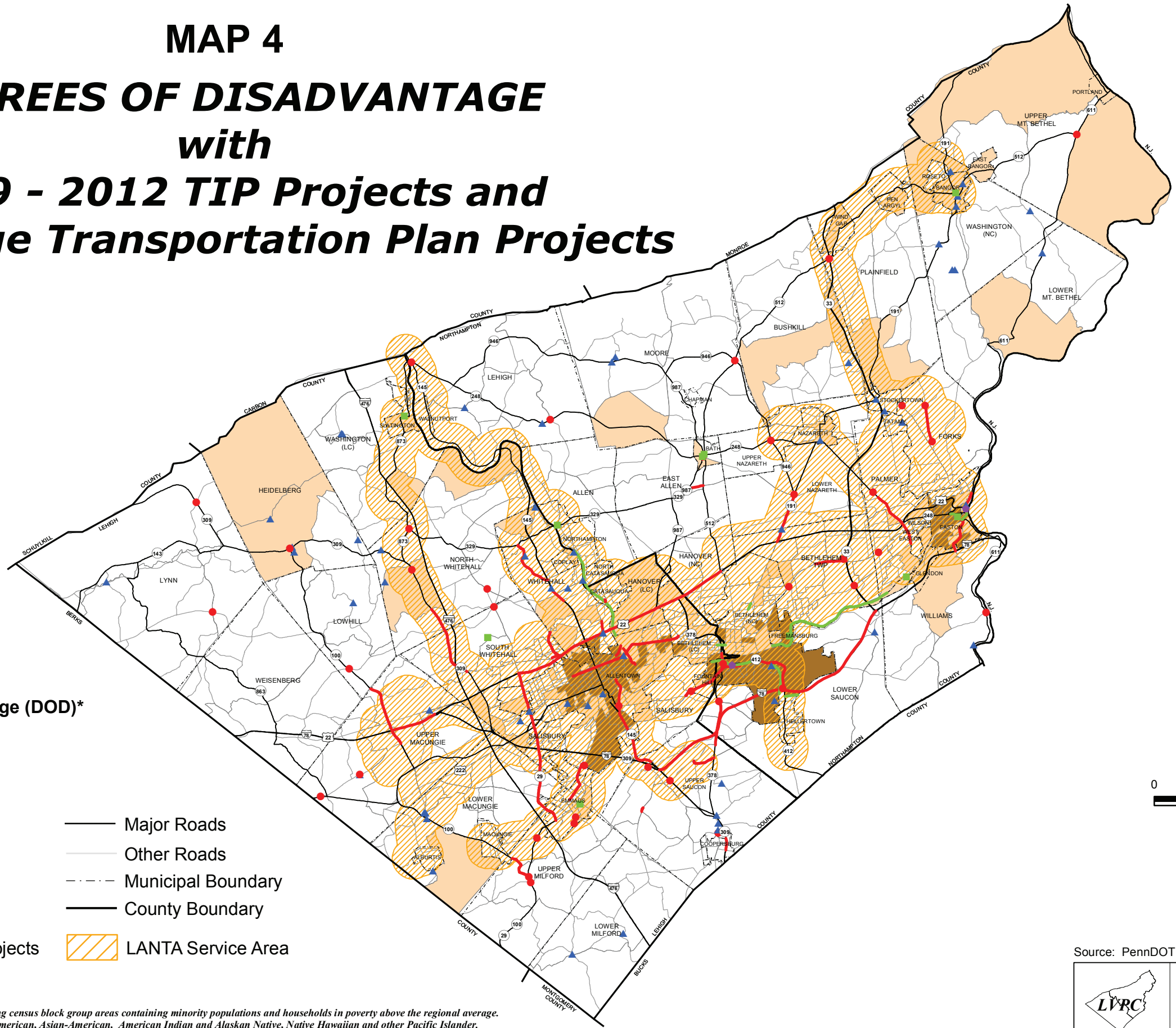
**Note: Degrees of Disadvantage is calculated by overlaying census block group areas containing minority populations and households in poverty above the regional average. Minority populations include: Hispanic, African-American, Asian-American, American Indian and Alaskan Native, Native Hawaiian and other Pacific Islander.*

MAP 4

DEGREES OF DISADVANTAGE *with* **2009 - 2012 TIP Projects and** **Long Range Transportation Plan Projects**

Degrees of Disadvantage (DOD)*

- 2 DOD
- 1 DOD
- 0 DOD
- Transit Projects
- Bridge Projects
- Highway Projects
- Enhancement Projects
- Major Roads
- Other Roads
- Municipal Boundary
- County Boundary
- LANTA Service Area



Source: PennDOT, Lehigh Valley Planning Commission



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*Note: Degrees of Disadvantage is calculated by overlaying census block group areas containing minority populations and households in poverty above the regional average. Minority populations include: Hispanic, African-American, Asian-American, American Indian and Alaskan Native, Native Hawaiian and other Pacific Islander.

TABLE 3

Number of Projects by Degrees of Disadvantage		
No. of Projects	Number of Projects with Degrees of Disadvantage (DOD)	
	2 DOD	1 DOD
156	25	42
	16%	27%

Out of the 156 projects considered in this analysis, 42 (27% of all projects) are located in census block groups with one degree of disadvantage while 25 projects (16% of all projects) are located in block groups with two degrees of disadvantage. Conversely, 89 projects (57 % of all projects) are located in block groups with zero degrees of disadvantage.

TABLE 4

Populations in Census Block Groups by Degrees of Disadvantage				
Degrees of Disadvantage	Minority Population		Low-Income Households	
	No.	%	No.	%
0	16,576	21%	4,206	25%
1	13,959	17%	3,427	20%
2	49,077	62%	9,310	55%
Totals	79,612	100%	16,943	100%

TABLE 5

Populations in Census Block Groups Containing Transportation Projects by Degrees of Disadvantage				
Degrees of Disadvantage	Minority Population		Low-Income Households	
	No.	%	No.	%
0	9,457	24%	4,377	57%
1	6,115	16%	1,262	16%
2	23,235	60%	2,107	27%
Totals	38,807	100%	7,746	100%

Table 4 depicts the populations in census block groups by 0, 1, and 2, degrees of disadvantage. Census block groups containing two degrees of disadvantage contain a minority population of 49,077 which represents 62% of the total minority population and 9,310 low-income households comprising 55% of the total low-income households. Table 5 is similar to Table 4, but shows populations in census block groups that contain transportation projects by degrees of disadvantage. A minority population of 23,235 (60% of total minority population in census block groups with transportation projects) and 2,107 low-income households (27% of

total) reside in census block groups containing transportation projects with 2 degrees of disadvantage.

The provision of fixed route and demand-responsive public transportation services is of significant importance to environmental justice communities. Although public transit services are available to the general public as a whole, a large portion of LANTA's patronage consists of minorities and low-income, the largest concentrations of which reside within the urbanized areas of Allentown, Bethlehem, and Easton as depicted on Maps 1 and 2, respectively. Segments of this population do not own or have access to a vehicle and thus public transit is their only means of transportation. Thus the benefits of public transit services to disadvantaged populations far outweigh the burdens associated with both having and not having those services.

Map 4 depicts the transit service area legislatively defined as extending $\frac{3}{4}$ mile on each side of a fixed bus route. The vast majority of census block groups containing two degrees of disadvantage are covered with public transportation services. Most of the census block groups with one degree of disadvantage that are located within the urbanized area are also served with public transit. Several census block groups not served with transit are located in the rural northern tier of the region. Although they contain minority or low-income populations above their respective regional averages, the actual populations inhabiting these block groups tend to be lower than found in urbanized areas.

FINDINGS

The program as a whole, which includes all projects on the long range transportation plan and the 2009-2012 Transportation Improvement Program, does not create a disproportionately high and adverse impact on low-income and minority populations based upon these distributions cited and that these LVTS plans and programs are consistent with Executive Order 12898 and the Department of Transportation *Order to Address Environmental Justice in Minority Populations and Low-Income Populations*.

LVTS has supported and continues to support projects in EJ communities that will provide long-term benefits as stated above. These projects include but are not limited to transit intermodal centers in the cities of Allentown, Bethlehem, and Easton; American Parkway and New England Avenue to provide access to center city Allentown; Route 412 Improvements; replacement of the Linden Street Bridge in Allentown; and replacement of the 4th Street/Daly Avenue and Lynn Avenue bridges in Bethlehem. However, this report does not analyze the benefits or burdens of individual projects – a task that has generally been conducted during the preliminary engineering phase as more project-specific details, such as proposed design alternatives, right-of-way impacts, etc. become available. The project-level analysis takes into account a more detailed look at determining any potential disproportionately high and adverse impacts.

EVALUATE AND IMPROVE PUBLIC INVOLVEMENT EFFORTS

The LVPC has been engaged in various public involvement efforts starting with the LVTS Public Involvement Plan and culminating with the LVTS Public Participation Plan adopted in December 2007. Public involvement is a vital component of the transportation planning process. Providing full disclosure of plans and programs not only during the development phase but also after the adoption of these plans and programs allows the general public the opportunity to be involved, comment on, and influence the development process. Every person, regardless of race, religion, ethnicity, gender, disability, or socio-

economic status should have the opportunity to take part in and influence the transportation planning process. The LVTS Public Participation Plan provides for and documents the methods utilized to achieve this outcome.

LVTS evaluates the effectiveness of its public participation efforts biennially to coincide with the adoption of TIPs and long range transportation plans. To gauge the effectiveness of current public participation efforts, PennDOT Performance Benchmarks and the associated Public Involvement Questionnaire are utilized as well as any revisions to the final planning rule. Releases of more current socio-economic data from the U.S. Census Bureau are utilized to determine where future public participation efforts should be focused.

Difficulties have been experienced over the years in obtaining any form of public input from not only minority and low-income persons, but the general public. Efforts have included numerous tasks aimed at increasing input from minority and low-income individuals. Public meetings have been moved to downtown areas more thoroughly served by public transportation. Public notices/public service announcements have been sent to various media outlets such three local television cable providers for posting on their channel stations, WFMZ TV 69 Spanish News, smaller community newspapers, El Torero Spanish Newspaper, Lehigh Valley Black News Network, and approximately 3 dozen social service agencies that directly provide services to minorities and low-income individuals. LVTS has utilized a marketing consultant for translation of notices into non-English languages for posting in Lehigh and Northampton Transportation Authority (LANTA) buses. In addition, LANTA, LVPC, PennDOT, and RegionOnline websites have been utilized for information dissemination. Despite these efforts, turnout at public meetings has remained poor.

Consequently, a proactive public involvement effort has been undertaken. Organizations that provide services to or directly represent underrepresented persons have been identified and public outreach meetings have been held with these organizations. These organizations represent the low-income, minority, elderly, and disabled communities. In addition, meetings have been held with public and private transportation sector representatives such as freight shippers and logistics providers. These meetings have been arranged and scheduled by staff to directly seek input on transportation issues pertinent to each group as well as on various transportation plans and programs. This effort ensures the voices of these groups are heard, even if they cannot attend public meetings on transportation issues.

TRAINING/STAFF EDUCATION

Staff attends various civil rights training programs offered by FHWA/FTA as they arise. Most recently, staff attended a U.S. Department of Transportation/Federal Transit Administration/Conference of Minority Transportation Officials Civil Rights Training Seminar in Philadelphia during September 2007. Topics addressed include Title VI of the Civil Rights Act of 1964, Environmental Justice, and Limited English Proficiency. Staff also attended in October 2003 a 2-day training seminar titled Title VI/Environmental Justice Preventing Discrimination in the Federal-aid Program. Topics addressed varied greatly and included the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Title VI and Title VII, the Uniform Act of 1970, Federal-aid Highway Act of 1973, Section 504 of the Rehabilitation Act of 1973, Age Discrimination Act of 1975, various DOT and FHWA circulars, Executive Order 12898 and DOT and FHWA responses, and Limited English Proficiency. Prior to then a National Transit Institute Federal Program 3-day training session titled Public Involvement in Transportation Decision Making was attended in March 1997. Staff will continue to attend training in these matters as opportunities arise.