



APPENDIX J

Environmental Justice Supporting Information

Environmental Justice and Limited English Proficiency Technical Report

Environmental Justice refers to the practice by which transportation projects are planned in such a manner as to minimize disproportionate impacts to area with high percentages of minority and low-income residents, as well as those with limited English proficiency and the elderly. The guiding environmental justice principles followed by U.S. DOT and FTA in the FTA Circular 4703.1 effective August 15, 2012 are:

- To avoid, minimize, or mitigate disproportionately high and adverse effects.
- To ensure the full and fair participation by all potentially affected communities.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Federal guidelines and regulations governing the environmental justice analysis conducted for the Cobb County BRT project are described below.

Minority and Low Income

Executive Order 12898 (EO 12898), Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was signed into law in February 1994 by President Clinton. EO 12898 requires federal agencies to achieve environmental justice by determining and addressing social and economic impacts of programs, policies, and activities for minority and low-income populations. Impacts are determined to disproportionately affect minority and low-income populations more severely than populations which are not low-income and/or non-minority. Environmental justice refers to fair treatment of all people regardless of race, color, sex, national origin, or income with respect to federal actions.

In May 2012, the U.S. DOT issued an updated Internal Order, Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. The Order updates the Department's original Environmental Justice order published in 1997. A circular issued by the Federal Transit Administration in August 2012 provides recipients of FTA financial assistance with guidance for incorporating environmental justice principles into plans, projects, and activities funded by FTA.

In accordance with this federal guidance, minority populations include persons who are American Indian and Alaskan Native, Asian, Black or African-American, Hispanic or Latino, and Native Hawaiian or other Pacific Islander.

Low-income populations are defined as households with a median income at or below the US Department of Health and Human Services (HHS) poverty guidelines. It may also be defined as a percentage of median income for the area, as long as the definition is at least as inclusive as the HHS guidelines. The 2010 HHS guidelines to determine poverty are indicated in **Table 1** below.

Table 1. 2010 Poverty Guidelines for the 48 Contiguous States and the District of Columbia

Household Size	Income Threshold
1	\$10,830
2	\$14,570
3	\$18,310
4	\$22,050
5	\$25,790
6	\$29,530
7	\$33,270
8	\$37,010
Add \$3,740 for each additional person after 8 persons	

Source: US Department of Health & Human Services, <http://aspe.hhs.gov/poverty/10poverty.shtml>

Other Populations Which May Receive Disproportionate Impacts

Title VI of the Civil Rights Act of 1964 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 subject to discrimination under any program or activity receiving federal financial assistance.” This policy is also extended to protect persons of Limited English Proficiency (LEP) and elderly populations, two groups which may experience disproportionate impacts compared to other groups.

Limited English Proficiency

Executive Order 13166 requires meaningful access and participation for federally funded programs, policies, and activities for Limited English Proficiency (LEP) individuals. EO 13166 provides enforcement and implementation under a provision contained in Title VI of the Civil Rights Act of 1964 which prohibits recipients of federal financial assistance from discriminating against persons based on national origins through refusal of access for LEP persons. Additionally, EO 13166 requires all agencies to meet the same standards for access to LEP persons to federally conducted programs, policies, and activities whether they are recipients of federally funding or not. Under EO 12898, each federal agency must provide LEP access. Meaningful access includes, but is not limited to document availability in one or more languages, dependent on project location; translation services during public meetings; and development of an official language implementation plan, the Language Assistance Plan (LAP).

According to the Census Bureau, LEP populations are those over the age of five and above who have a limited ability to read, write, speak, or understand English very well or at all.

Elderly Populations

The Age Discrimination Act of 1975 prohibits the discrimination of individuals based on age from having access to and participating in federally funded programs, policies, and activities. Persons aged 65 and older are considered as elderly population for this environmental justice analysis.

Methodology

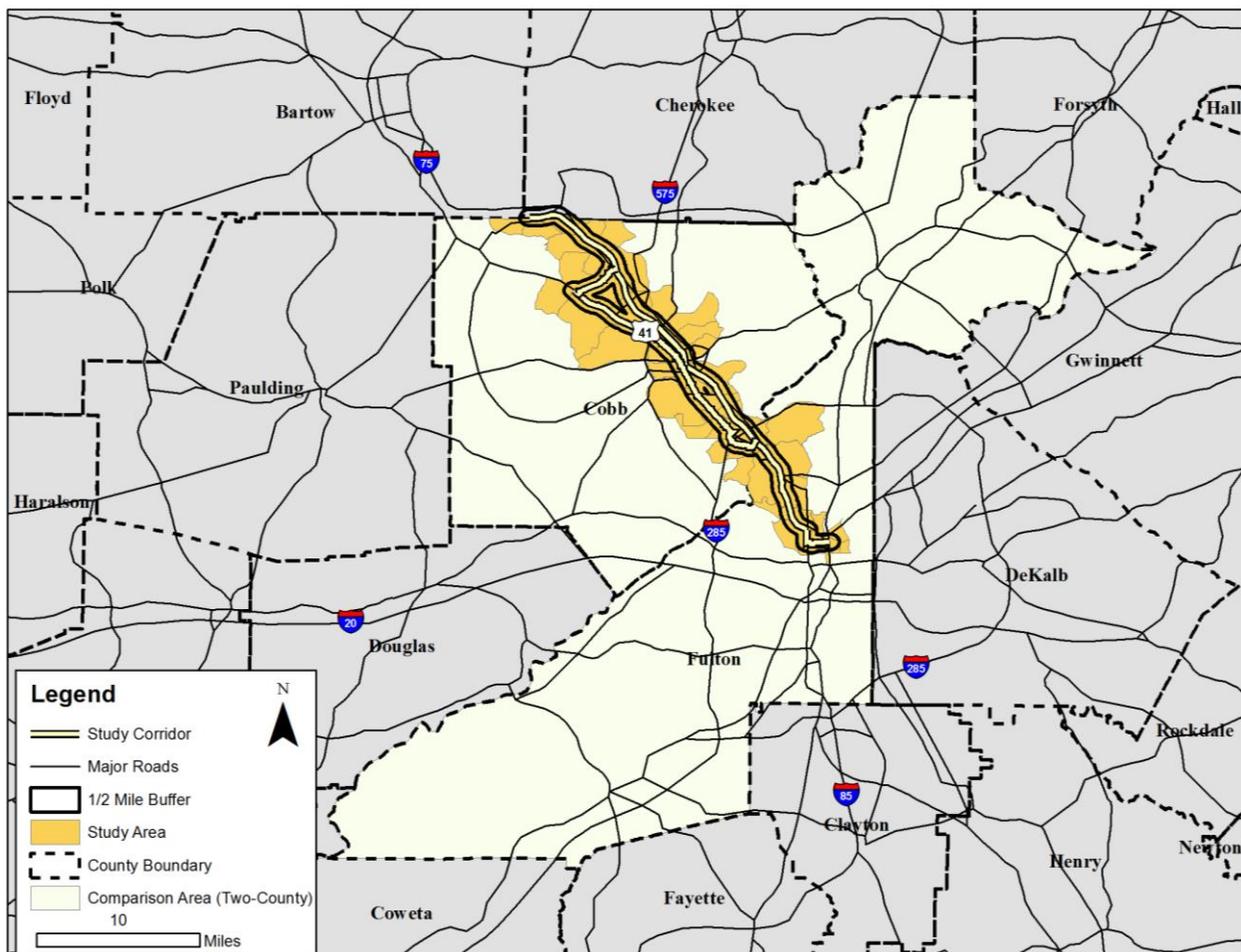
The environmental justice assessment for this EA was conducted for minorities, low-income, LEP, and elderly populations along the BRT project corridor.

The methodology for analyzing the effects of the proposed Cobb County project on these populations consists of the following steps:

- Define the study area boundary and identify census tracts in that area;
- Determine thresholds for minority, low-income, and/or other populations to identify potential locations of environmental justice populations;
- Identify the location of environmental justice and Title VI populations based on thresholds and additional information;
- Analyze the location and severity of impacts associated with the project; and
- Determine disproportionately high and adverse impacts (if any) on environmental justice populations.

To evaluate the potential for disproportionate impacts on minority, low-income, LEP and elderly communities, 2010 Census and 2006-2010 American Community Survey (ACS) tracts adjacent to the proposed BRT corridor buffer, which extends ½ mile from the US-41 and I-75 from downtown Atlanta to Kennesaw State University, were identified. This environmental justice study area consists of 48 Census tracts. **Figure 1** shows the environmental justice study area and the two-county comparison area.

Figure 1. Environmental Justice Study Area and Comparison Area



GIS Analysis

GIS analysis was used to compare the fraction of minority, low-income, LEP, and elderly populations within each tract with the fraction in the two-county comparison area consisting of Cobb and Fulton Counties; information for the overall Atlanta metropolitan statistical area (MSA) is also provided for context.

The most comprehensive data sets containing current information available for analyzing small populations with the largest sample size include the 2010 U.S. Census for the minority and age data, and the 2006-2010 American Community Survey Data for income and LEP information at the census tract level.

The 2010 Census provides the official counts of population, sex, age, race and housing units. The 2006-2010 American Community Survey provides intercensal sample estimates of the population and records income, education, occupation, poverty status, and language spoken at home; which were not tabulated in the 2010 census.

MINORITY CONCENTRATION CALCULATION

The U.S. Census 2010 SF1 population table was utilized to calculate the minority population. The Census records race classifications through self-identification; persons that identify themselves as non-white alone were considered as minorities. Hispanic is not considered a race according to the Census, and is listed as an ethnicity. Accordingly, those individuals who considered themselves Hispanic of any race were considered as the Hispanic population. The total Hispanic population and the aggregate minority non-Hispanic populations were added and divided by the total population in each geographic unit to determine minority percentage.

LOW-INCOME CONCENTRATION CALCULATION

The 2006-2010 American Community Survey C17002 (Ratio of Income to Poverty Level in the Past 12 Months) and B19013 (Median Household Income) were used to determine poverty status and median household income. The total population for poverty was divided by the total population in each geographic unit to determine low-income population percentage. The median household income in each geographic unit was recorded.

LIMITED ENGLISH PROFICIENCY (LEP) CONCENTRATION CALCULATION

The 2006-2010 American Community Survey B16001 (Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over) was used to determine Limited English Proficiency. The total population of each language category which identified they spoke "English less than 'very well'" was added together and divided by the total population in each geographic unit to determine the LEP population percentage.

ELDERLY CONCENTRATION CALCULATION

For analysis of elderly populations, the Census 2010 SF1 population table was utilized to calculate persons aged 65 years or older. The total elderly population was divided by the total population in each geographic unit to determine the elderly percentage.

Definition of Environmental Justice Populations

The thresholds for determining a "special population" for this analysis are compliant with the Council on Environmental Quality (CEQ) document entitled *Environmental Justice: Guidance Under the National Environmental Policy Act of 1997*. FTA does not specify thresholds for determining whether a target population qualifies as "minority" and/or "low-income, although U.S. DOT provides guidance which help identify environmental justice communities. The

recommended thresholds are similar to the CEQ's environmental justice guidance, which identified environmental justice populations where one or more of the following conditions are met.

For Minority populations:

- 10 percentage points higher than county average, or
- 50 percent of the total geographic unit (e.g., census tract), or
- Site visit observations of local official/stakeholder input

For low-income, there are no set thresholds:¹

- Criteria include percent below poverty level, "very poor", and "near poor"
- Site visits observations or local official/stakeholder input

There are no set thresholds to determine LEP and elderly populations.

For purposes of this environmental justice analysis, a census tract is considered to have an environmental justice population if the percentage of the special population group is above 50 percent of the total population within that tract, or is at least 10 percentage points higher than two-county comparison area (Cobb and Fulton Counties).

The following definitions are used to identify areas with environmental justice populations:

- A minority community for this project is defined as a census tract with a minority population greater than 50 percent of the total population in the tract, or 10 percentage points higher (62.5 percent) than the two-county comparison area.
- A low-income community for this project is defined as a census tract in which the fraction of households with an average household income of under 150 percent of the poverty level is greater than 50 percent of the households in the tract, or exceeds the fraction in the broader two-county comparison area by at least 10 percentage points (31.1 percent). The poverty level as defined by the U.S. Department of Health and Human Services Poverty Guidelines (2010), with the range of annual income for households between one and eight persons is \$10,830 and \$37,010 respectively, as shown in previous Table 4.18-1.
- LEP communities are defined as census tracts in which the LEP population is greater than 50 percent of the total population in the tract, or at least 10 percentage points higher than the average for the two-county comparison area (17.2 percent).
- Elderly communities for this project are defined as census tracts where the fraction of population of individuals at least 65 years old is greater than 50 percent of the total population in the tract, or at least 10 percentage points higher than the two-county average (18.9%) tract.

¹ A low-income community can be based on the percent of the population that is "very poor" (under 50 percent of poverty level), or the percent "near poor" (between 100% to 150% of the poverty level, or some combination of the above). For this study, the population between under 50 percent of the poverty level and 150 percent of the poverty level were added and divided by the total population of each geographic unit to determine low-income percentage. (FHWA. "Guidance for Conducting Community Impact Assessments")

Affected Environment

Table 2 summarizes the socioeconomic and demographic characteristics of the population used for identifying environmental justice populations, and compares these characteristics with the two-county comparison area; for information purposes, characteristics are also provided for the Atlanta MSA. The study area has approximately 248,000 persons and 107,000 households. The area has a large minority population, but at 44 percent it is smaller than the minority population in the two-county comparison area (52.5 percent). Low-income population is similar, with both areas having about 21 percent low-income households (although the study area has a higher median income). Percent elderly is slightly lower in the study area (about eight percent) and percent LEP is slightly higher (about nine percent) than in the comparison area.

Table 2. Summary of Socioeconomic and Demographic Characteristics

Characteristic	Environmental Justice Study Area	Comparison Area (Two-County)	Atlanta MSA
2010 Census Population	247,571	1,608,659	5,268,860
Total Households	107,140	636,433	1,937,225
Percent Minority	44.3%	52.5%	49.3%
2006-2010 ACS Population	221,610	1,452,424	4,741,122
% Low Income HH	21.6%	21.1%	21.2%
Median HH Income	\$66,770	\$60,573	\$57,550
Percent Elderly	7.8%	8.9%	9.0%
Percent LEP	9.6%	7.2%	7.7%

Sources: U.S. Census Bureau, 2010. American Community Survey, 2006-2010

Table 3 provides a breakdown of population by racial/ethnic group. Nearly 23 percent of the study area population is black, compared with over 35 percent in the comparison area and 32 percent in the Atlanta MSA. The study area has a slightly higher fraction of Latinos, about 12 percent versus 10 percent for the comparison area. Population fractions for other racial groups are similar. **Figure 2** shows the percentage of minority population in the study area by census tract, and identifies which tracts meet the threshold for environmental justice populations of 50 percent more than the total geographic unit.

The figure shows a cluster of neighborhoods in the middle of the corridor, primarily between Allgood Road and Cumberland Boulevard in the cities of Marietta and Smyrna that exceed the threshold, with some outlying communities in downtown Atlanta, and north of the city of Acworth.

Table 3. Racial and Ethnic Characteristics

Characteristics	Environmental Justice Study Area	Comparison Area (Two-County)	Atlanta MSA
White	137,831	763,452	2,671,757
Percentage	55.7%	47.5%	50.7%
Black, non-Hispanic	56,775	568,510	1,679,979
Percentage	22.9%	35.3%	31.9%
American Indian/Alaskan Native (AIAN)	507	2,918	10,734
Percentage	0.2%	0.2%	0.2%
Asian	15,049	81,736	252,510
Percentage	6.1%	5.1%	4.8%

Characteristics	Environmental Justice Study Area	Comparison Area (Two-County)	Atlanta MSA
Other Races, non-Hispanic	6,889	35,147	106,480
Percentage	2.8%	2.2%	2.0%
Latino	30,520	156,896	547,400
Percentage	12.3%	9.8%	10.4%
Percent Minority¹	44.3%	52.5%	49.3%

Source: U.S. Census Bureau, 2010

¹ Percent Minority: The combined total of black, AIAN, Asian, One/Two or More, and Latino

Figure 2. Minority Populations in the Study Area

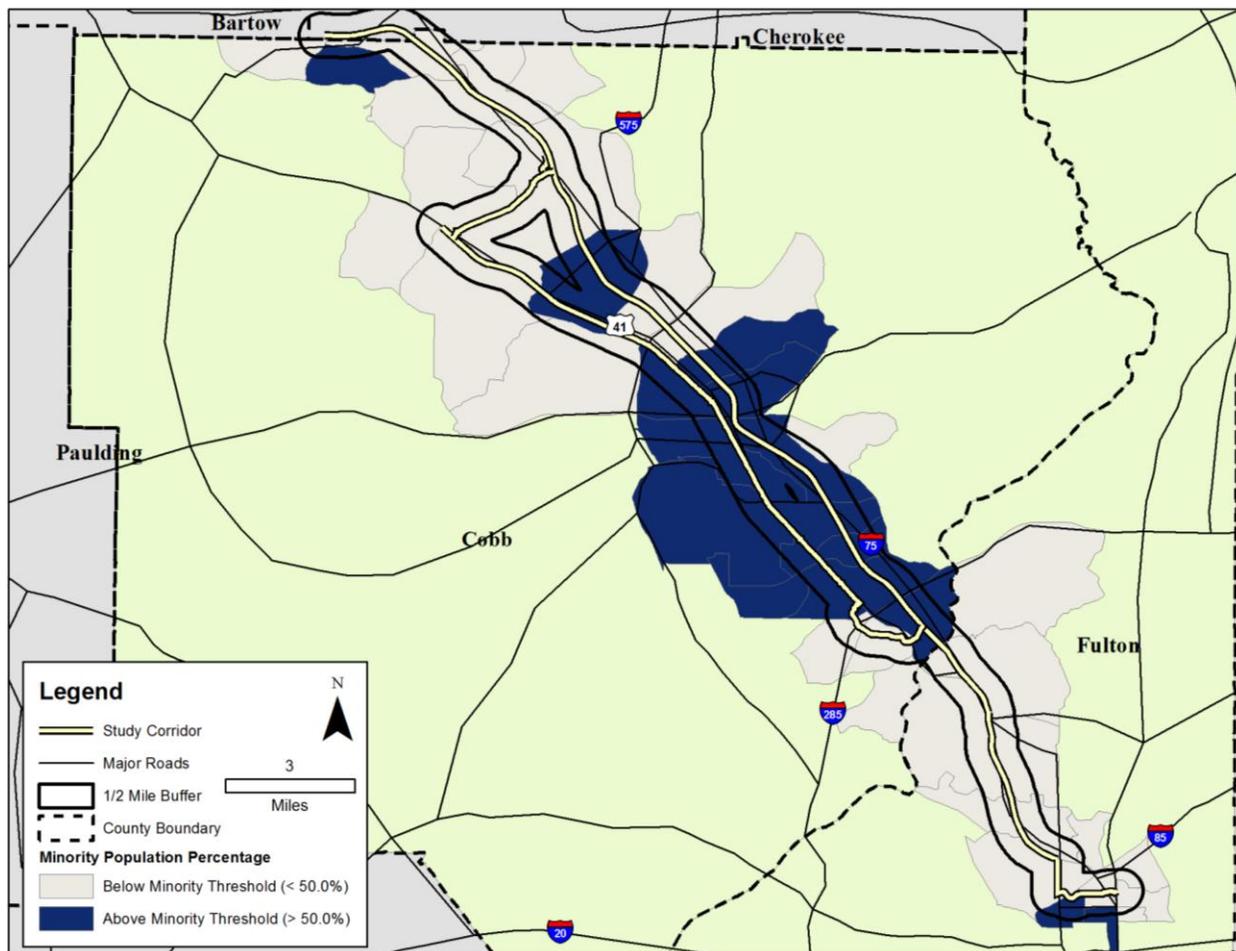
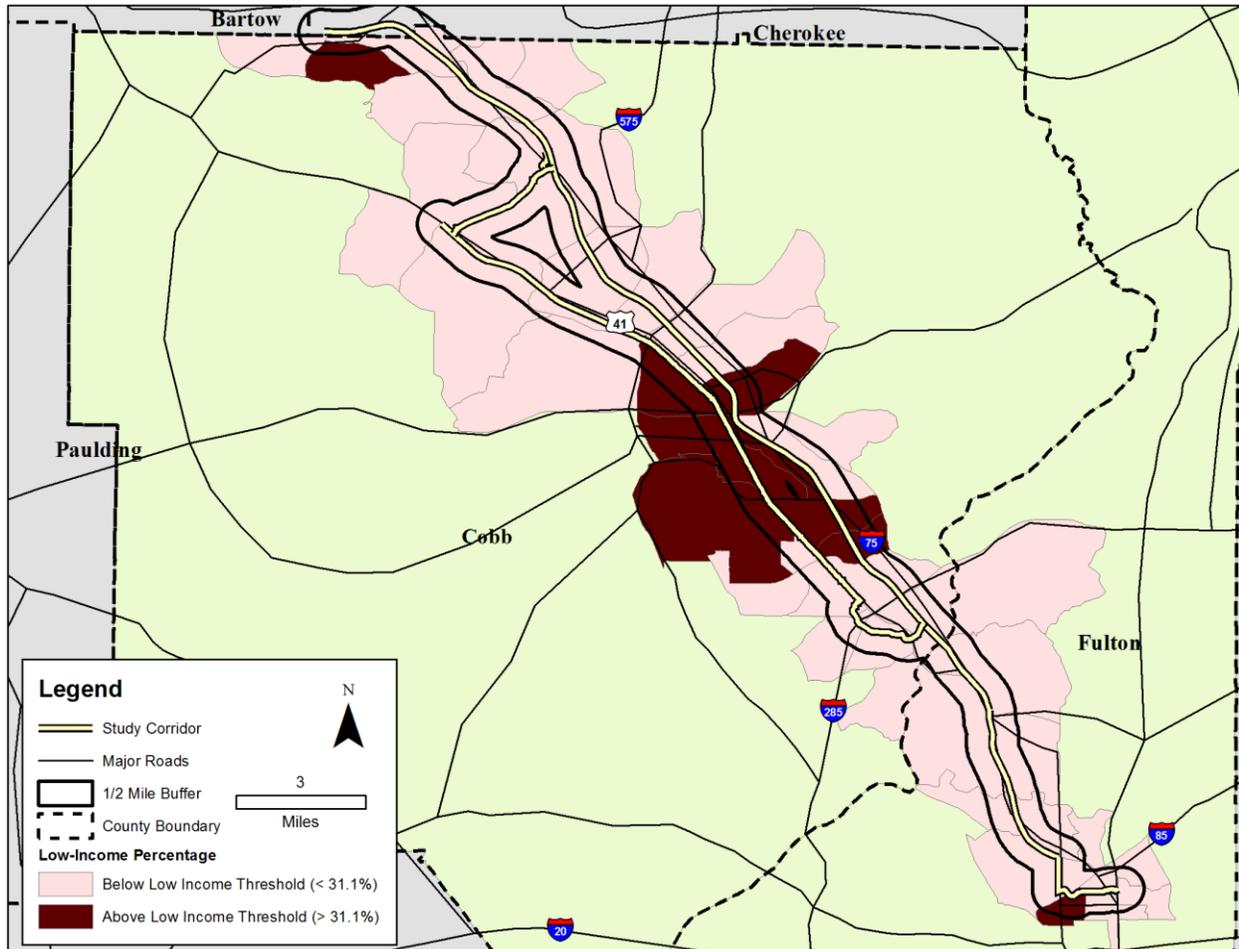


Figure 3 shows the census tracts in the study area which exceed the threshold for percent low-income households. The threshold for defining low-income tracts is 10 percentage points more than the low-income population in the comparison area as a whole (21.1 percent), or 31.1 percent.

The figure shows a cluster of neighborhoods in the middle of the corridor, primarily between Allgood Road and Windy Hill Road in the cities of Marietta and Smyrna that exceed the threshold of the definition of environmental justice communities according to income

guidelines. In other parts of the study area, between three and 28 percent of households fall below 150 percent of poverty level.

Figure 3. Low-Income Populations in the Study Area



As shown in **Table 4**, the largest LEP population in both the study and comparison areas is Spanish or Spanish Creole speakers at just over five percent. The second largest LEP population in the study area is Portuguese speakers (nearly one percent).

Table 4. Limited English Proficiency Distribution

Population	Environmental Justice Study Area	Benefit Area (Two-County)	Atlanta MSA
Total Population	221,610	1,452,424	4,741,122
English Only	170,692	1,199,300	3,943,937
Percentage	77.0%	82.6%	83.2%
Total Foreign Language	50,918	927,978	797,185
Percentage	23.0%	17.4%	16.8%
Total LEP Population	21,252	104,815	365,761
Percentage	9.6%	7.2%	7.7%

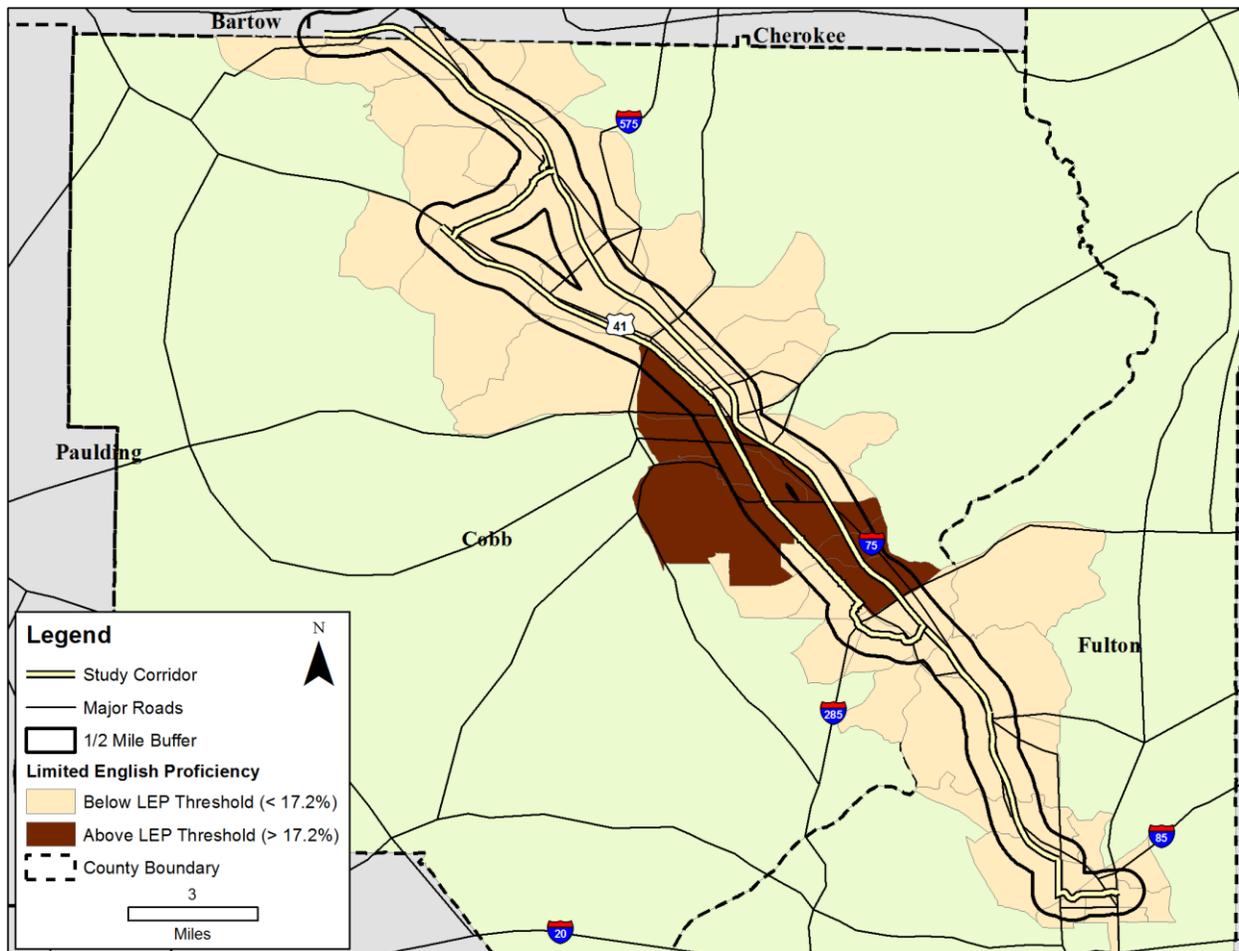
Population	Environmental Justice Study Area	Benefit Area (Two-County)	Atlanta MSA
By Language			
Spanish	13,092	66,255	232,454
Percentage	5.4%	4.6%	4.9%
Portuguese	2,182	4,057	4,842
Percentage	0.9%	0.3%	0.1%
Chinese	1,034	4,881	15,326
Percentage	0.4%	0.3%	0.3%
Korean	459	5,498	20,780
Percentage	0.2%	0.4%	0.4%
French	498	2,405	6,641
Percentage	0.2%	0.2%	0.1%
Vietnamese	469	2,522	20,538
Percentage	0.2%	0.2%	0.4%
All Other Languages	3,518	19,197	65,180
Percentage	1.6%	1.3%	1.4%

Source: American Community Survey, 2006-2010

Figure 4 shows the concentration of LEP households in the study area by census tract which exceed the threshold. The threshold for defining low-income tracts is 10 percentage points more than the LEP population in the comparison area as a whole (7.2 percent), or 17.2 percent.

The areas with the highest LEP population concentrations are clustered towards the center of the Study Area primarily between Allgood Road and Spring Road in the cities of Marietta and Smyrna, where the limited English proficiency exceeds 20 percent in some areas.

Figure 4. LEP Population in the Study Area



The age distributions of the study area and comparison areas are shown in **Table 5**. Approximately eight percent of the study area population is aged 65 years of older (19,400 persons). This is slightly less than the percent of elderly population in the comparison area.

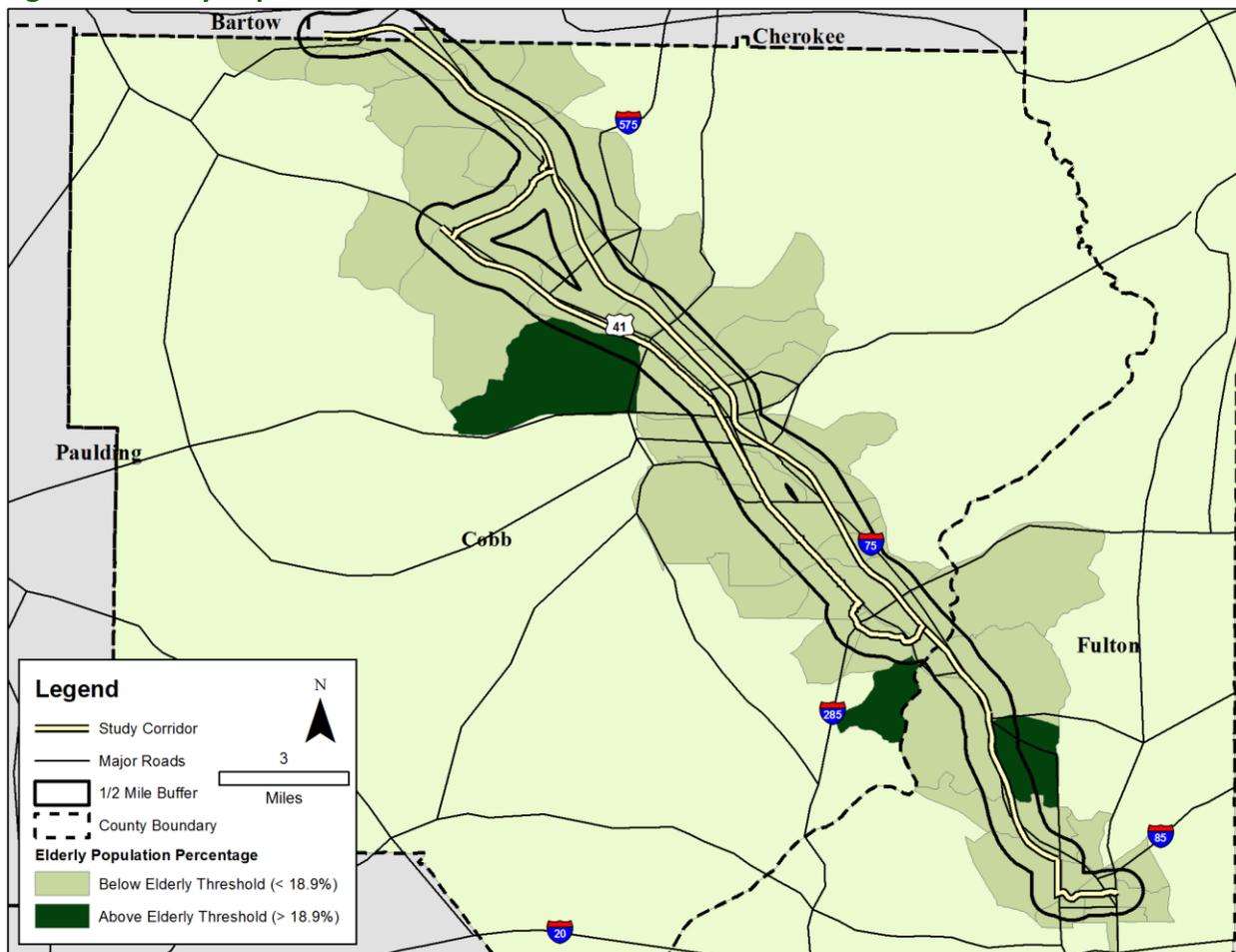
Figure 5 shows the census tracts in the study area with an elderly population concentration exceeding the threshold for defining environmental justice communities in this analysis. In a few neighborhoods in the central and southern end of the corridor, over 19 percent of the population is at least 65 years old, which is 10 percentage points higher than the comparison area (8.9 percent).

Table 5. Population Age Distribution

Age Group	Environmental Justice Study Area	Benefit Area (Two-County)	Atlanta MSA
Under 18 Years	52,533	396,173	1,396,352
Percentage	21.2%	24.6%	26.5%
18 to 64 Years	175,681	1,069,090	3,400,755
Percentage	71.0%	66.5%	64.5%
65+ Years	19,357	143,396	471,753
Percentage	7.8%	9.4%	9.0%
Total Population	247,571	1,529,348	5,268,860

Source: U.S. Census Bureau, 2010

Figure 5. Elderly Populations



Environmental Consequences

A disproportionately high and adverse effect on environmental justice populations is defined as an effect that is predominately borne by, or would be suffered by an environmental justice population or that is appreciably more severe or greater in magnitude than adverse effects suffered by a non-environmental justice population. In general, the determination of



disproportionately impacted environmental justice populations is made by analyzing the pattern of overall environmental or human health impacts in relation to identified areas of environmental justice populations. Adverse effects are the totality of significant individual or cumulative human health or environmental effects.

Minority populations are not disproportionately present within the study area as compared to the two-county comparison area. However, there are some neighborhoods that meet one or more criteria for being defined as environmental justice populations.

Environmental Justice and Title VI Populations

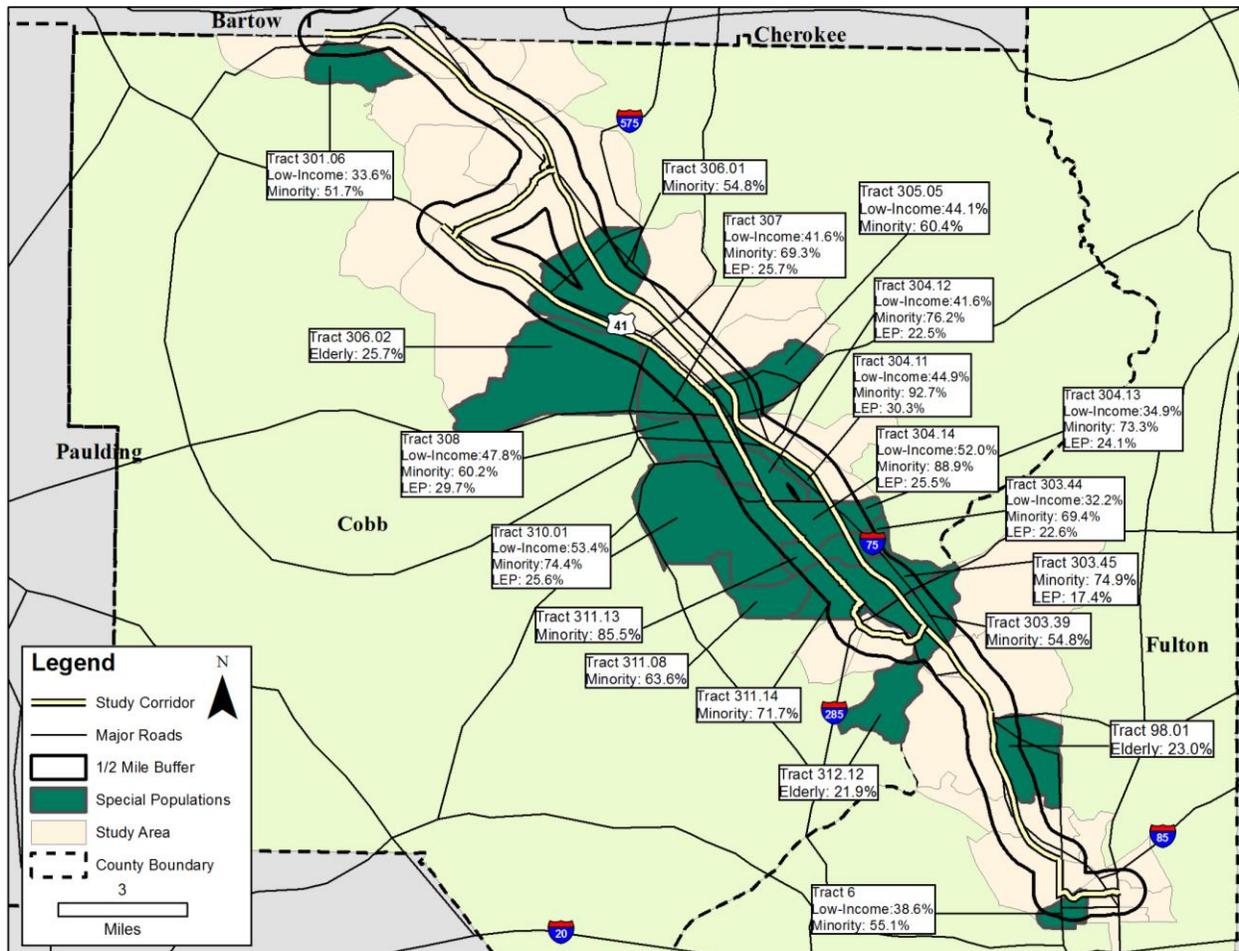
Table 6 details the 20 census tracts which exceed thresholds for low-income, minority, elderly, and LEP populations, that make up the defined environmental justice and Title VI communities for the purposes of this study which could potentially be impacted. As indicated, 11 census tracts meet two or more thresholds for minority, low-income, and/or LEP populations. Three census tracts have high concentrations of elderly populations but these do not overlap with any of the other groups.

Figure 6 shows the concentration of environmental justice communities in the study area by census tract which exceed the threshold for low-income, minority, elderly, or LEP populations. The areas with environmental justice communities include a portion of downtown Atlanta, the city of Marietta between Greers Chapel Road and Cumberland Boulevard, and one community north of the city of Acworth.

Table 6. Large Concentrations of Environmental Justice Populations by Census Tract and County

Census Tract	County	Median Household Income	Percent Low Income	Percent Minority	Percent LEP	Large Concentrations of Special Populations		
						Poverty	Minority	LEP
301.06	Cobb	\$44,459	33.3%	51.7%	10.9%	X	X	
303.39	Cobb	\$54,455	13.7%	54.8%	9.1%		X	
303.44	Cobb	\$42,323	32.2%	69.4%	22.6%	X	X	X
303.45	Cobb	\$53,074	25.0%	74.9%	17.4%		X	X
304.11	Cobb	\$33,519	44.9%	92.7%	30.3%	X	X	X
304.12	Cobb	\$40,119	41.6%	76.2%	22.5%	X	X	X
304.13	Cobb	\$41,127	34.9%	73.3%	24.1%	X	X	X
304.14	Cobb	\$30,409	52.0%	88.9%	25.5%	X	X	X
305.05	Cobb	\$33,655	44.1%	60.4%	14.6%	X	X	
306.01	Cobb	\$53,414	26.2%	54.8%	9.6%		X	
306.02	Cobb	\$68,071	12.3%	17.5%	2.3%			
307	Cobb	\$34,583	41.6%	69.3%	25.7%	X	X	X
308	Cobb	\$28,710	47.8%	60.2%	29.7%	X	X	X
310.01	Cobb	\$31,780	53.4%	74.4%	25.6%	X	X	X
311.08	Cobb	\$40,852	30.5%	63.6%	7.6%		X	
311.13	Cobb	\$35,955	28.0%	85.5%	12.5%		X	
311.14	Cobb	\$43,359	22.7%	71.7%	10.1%		X	
312.12	Cobb	\$128,520	7.1%	5.7%	0.0%			
6	Fulton	\$47,125	38.6%	55.1%	12.6%	X	X	
98.01	Fulton	\$132,188	4.5%	6.2%	0.6%			

Figure 6. Special Populations within Study Area



No Build Alternative

The No Build Alternative represents continuation of existing service and does not include any construction activities. Therefore, will be no short-term project-related adverse impacts to minority, low-income, LEP, or elderly populations. As described in the project’s purpose and need, without transit investment in the corridor, congestion will continue to grow and transit travel times will deteriorate. These long-term transportation effects would result in adverse effects that would not be avoided, minimized, or mitigated. However, the effects would occur throughout the study area, and no disproportionate adverse effects on environmental justice populations are anticipated as a result of the No Build Alternative.

Locally Preferred Alternative

Throughout the planning and environmental review phases for the project, outreach efforts have ensured that environmental justice populations have been provided with a range of opportunities for meaningful engagement on the project and issues that are important to them. A description of these public outreach activities, which have included preparation of informational materials in English and Spanish, as well as information kiosks at major transfer centers and briefings to community leaders, will be provided in the EA.

Analysis of each environmental issue as it relates to minority, low-income, LEP, and elderly populations is summarized below by environmental resource area. This includes discussion of any potential environmental consequences, and avoidance, minimization, and mitigation measures for the proposed BRT project. All adverse effects can be minimized or mitigated through implementation of measures identified in each section.

Throughout the planning and environmental review phases for the project, outreach efforts have ensured that environmental justice populations have been provided with a range of opportunities for meaningful engagement on the project and issues that are important to them. These public outreach activities have included preparation of informational materials in English and Spanish, as well as information kiosks at major transfer centers and briefings to community leaders. In anticipation of the November 12, 2013 public meeting, factsheets in English and Spanish were distributed at the CCT Cumberland Transfer Center and at the MARTA ARTS Center Station.

A range of impact categories evaluated in this EA were selected for review as they relate to minority, low-income, and LEP populations. The selected categories include land use, traffic, parking, neighborhood and community resources (including parks), air quality, hazardous materials, noise, displacements and relocations, transportation, safety and security, and visual. These categories were selected because the impacts tend to be localized and have the potential for high or disproportionate impact to environmental justice populations. Other categories evaluated in this EA were not considered because they either presented no impacts, or their effects would be experienced by all populations living in the environmental justice study area, regardless of race, ethnicity, or socioeconomic status.

LAND USE/CONSISTENCY WITH PLANS

No changes or adverse effects to existing land use or planned development would occur with construction or operation of the Connect Cobb Corridor project. Therefore, no related disproportionate adverse impacts on environmental justice populations are anticipated.

NEIGHBORHOOD AND COMMUNITY RESOURCES

The Connect Cobb Corridor project follows a generally commercially developed corridor.

There are no direct effects to parks or public lands anticipated in the corridor. No disproportionate adverse effects on environmental justice populations related to parks and public lands are anticipated as a result of implementation of the project.

AIR QUALITY

The Connect Cobb Corridor project is consistent with regional air quality conformity guidelines and, based on an anticipated reduction in vehicle miles of travel, would result in a modest beneficial impact to regional emissions. No adverse impact related to toxic air contaminants would result from the project. Construction related air quality impacts would be temporary, and no disproportionate adverse effects on environmental justice populations would result from the project.

HAZARDOUS MATERIALS

Operation of the Connect Cobb Corridor project would not result in increased usage, transport, release, or exposure of hazardous materials to people in the corridor. There are potential hazardous sites in the corridor, such as documented leaking underground storage tanks. However, no disproportionate adverse effects on environmental justice populations related to hazardous materials are anticipated as a result of implementation of the project.

NOISE

No noise impacts are anticipated as a result of the operation of the project. There would be temporary noise impacts during construction, but these would be borne by all populations in the corridor and would not cause disproportionate adverse effects on environmental justice populations.

DISPLACEMENTS AND RELOCATIONS

Because the project would be constructed primarily within existing rights-of-way, there are limited takings needed for its implementation. These takings are primarily associated with station areas, and small strip takes for stretches along US 41/Cobb Parkway. Right-of-way impacts would be borne by all populations in the corridor, and no disproportionate adverse effects on environmental justice populations are anticipated as a result of implementation of the project.

TRANSPORTATION IMPACTS

Changes in transit service introduced by the Connect Cobb Corridor project would have a positive effect on all populations within the corridor by way of providing additional options and improved travel times. These benefits would also apply to environmental justice populations.

SAFETY AND SECURITY

Implementation of safety and security plans and station safety and security measures such as lighting and surveillance would be executed equally across the entire system, and at all stations. No disproportionate adverse effects on environmental justice populations related to safety and security are anticipated as a result of implementation of the project.

VISUAL

The project would not result in a substantial change to the visual character of the corridor as a whole. There would be localized impacts in vicinity of station areas, largely due to loss of existing vegetation. Other visual improvements would be made as part of the project, and no disproportionate adverse effects on environmental justice populations related to visual effects are anticipated as a result of implementation of the project.

INDIRECT AND CUMULATIVE IMPACTS

The effects of past, present, and reasonably foreseeable future projects were evaluated for indirect and cumulative impacts on the natural and social environments. Based on that analysis, it was determined that mitigation efforts would be limited to adverse direct impacts. Direct impacts, as discussed above, would not result in disproportionate adverse impacts on environmental justice populations as a result of project implementation.

Mitigation Measures

Implementation of the Connect Cobb Corridor project would not result in disproportionate adverse impacts on environmental justice populations. The mitigation measures identified under each issue area would apply to all populations, and no specific mitigation measures are required to address impacts to environmental justice populations.