

Environmental Justice Planning

The MPO implements recommendations from Federal Highway Administration Federal Certification and Federal Transit Administration Triennial Reviews; updates maps and materials on locations of MLI populations from the most recent US Census and ACS data; develops EJ plan and General Public Opinion Survey instruments; identifies service inequities; attends training and webinars when available; reviews and evaluates policies and procedures regarding Title VI and EJ; and includes EJ considerations in project selection process.

2012 Federal Certification Review Response

As recommended in the 2004 certification review and the 2008 certification review, and made a corrective action in the 2012 certification review, the MPO has conducted quantitative analyses in an effort to assess and work toward ensuring that the benefits and burdens of its transportation projects and services are equitably distributed.

During the winter and spring of 2015, the MPO met regularly to review the future initiatives outlined in the EJ Plan and to develop a strategy to map existing conditions to determine current service and needs for the MLI population. In an effort to respond to Commercial and Multi-Family MLI Hot Spots, data for large commercial developments (such as malls and shopping centers) and multi-family residential areas (such as apartment complexes) were identified in order to analyze availability of transit services. Shopping centers and malls were identified primarily from staff knowledge and web searches. Land use records attached to the Forsyth County address point GIS layer provided confirmation and identified a few additional locations. Multi-family housing was identified from the land use field in the Forsyth County address point GIS layer. Points were consolidated to show only a single point for each complex. A ½-mile buffer was created around the proposed new Winston-Salem Transit Authority routes for comparison purposes. This data was used to produce the Hot Spot Composite MLI map (Figure 18). By assessing the location of Zero-Vehicle Ownership Households, the lack of availability of a motor vehicle was used as an indicator of transit need, so areas with high percentages of zero-vehicle households were identified. The number of households (and percentages) owning zero motor vehicles by Census block group was obtained from 2009-2013 American Community Survey (ACS) data. This data was used to produce the Zero-Vehicle Households and Transit Service map (Figure 20).

In response to the corrective action ***“to perform travel time studies to ensure that its transportation system does not disproportionately burden minority and low income populations and does not disproportionately benefit non-minority and non-low income populations,”*** the MPO explored numerous options and researched other MPOs and case studies in Boston and California. A metric standard for travel time used in all studies was accessibility based on a 40 minute transit trip/20 minute automobile trip. This metric did not seem to fit the distances and congestion profile of the Winston-Salem MPO. Other potential methodologies included travel time studies that could provide a comparison metric standard for peak and non-peak trips by transit and automobile from selected MLI origins to selected high volume destinations. The chosen methodology for the MPO travel time study was based on an identified regional employment and medical services destination, Wake Forest Medical Center, to high volume destinations on the north and south of the City, the Walmart shopping centers - staff called this the Walmart Standard.

The March 2015 Transit/Auto travel time study and analysis provided a number of insights and issues to continue to explore. The difference in transit /auto ratios between regional and local trips suggested that indirect routing, transfer delays due to infrequent service, and congestion on local streets, causes local transit routes to be less competitive with auto travel than regional routes. Although the implementation of NextBus technology has made transit service more predictable, the transit trips from the Oak Summit Walmart to the Wake Forest Baptist Medical Center; and the Wake Forest Baptist Medical Center to the Parkway Village Walmart were not competitive with auto travel time. The comparison of travel time by transit to travel time by auto was calculated in the form of a ratio by dividing transit travel time by auto travel time, the “Transit/Auto Ratio” is referenced in the “Environmental Justice Travel Time Study” in the **Appendix**. Ratios greater than 1.0 reflect transit travel times that exceed auto travel times. The Transit/Auto Ratio for the trips ranged from 2.05 to

3.06 to the north, to 6.46 to 10.31 to the south. Direct routing, frequent service, improved transfer options, and street-level speed enhancements for transit would all contribute to making transit a viable competitor to the automobile.

Other discussion items included the desire and difficulty of producing a system-wide map that would graphically identify trip times (perhaps by mode) and to determine if there are discernable inequities for major destinations such as the hospital or key shopping areas. Although the MPO has begun to conduct quantitative analyses, there are further questions and avenues to pursue as outlined in the **Future Initiatives** section.

Service Equity

The MPO's analytical process for assessing service equity for EJ populations is currently included in the project selection process by adding an EJ category to the project ranking table and to the MTP Street and Highway Table. Also, the evaluation criteria for CMAQ funds now includes an EJ component. Future initiatives include gather more data on infrastructure and per capita expenditures by MLI populations. Additionally, the MPO considers EJ issues in analyzing the following to determine service equity based on two categories:

Maintenance

Pavement Management System
Street, sidewalk, and lighting repair
Safety Program improvements
Percent deficient sidewalk

New Service

Bond project selection process
Highway vs public transit capital cost
Percent sidewalk in MLI
Annual Capital Improvement Program

Transit Planning

In order to comply with the requirements for obtaining Federal Transit Authority (FTA) "Capital and Operating Assistance", the Winston-Salem Transit Authority (WSTA) performs an annual Title VI Assessment. The objectives included in the Title VI Assessment cover goals of service equity, access mobility, public participation, and corrective actions to prevent discriminatory treatment all without regard to race, color, or national origin. WSTA also undergoes a triennial FTA Certification review. This certification review includes the necessity for WSTA to comply with Title VI and EJ regulations.

WSTA monitors its service equity and quality by using a number of measures identified in its Title VI Assessment. These measures include Load Factors, Vehicle Assignment Records, a Travel Time Matrix, and an overview of the Fixed Route System. Most of these measures identify which routes are minority and non-minority. The assessment also identifies other benefits that accommodate specific minority groups. An outgrowth of the Environmental Justice Travel Time Study was the full evaluation of the conditions on the two transit study routes which led to the implementation of bus stop and shelter improvements along existing Routes 10 and 13 (future Routes 7 and 3). The planning and recommendations including the EJ and ADA evaluation for the transit improvements is in the **Appendix**.

In March 2008, the MPO completed and adopted the Winston-Salem Urban Area Human Services Transportation Plan. The objective of this plan is to evaluate gaps on service for elderly citizens, persons with disabilities, and low income populations and find ways to provide greater access to transportation services. The plan identifies the disabled, elderly, and low income populations within the MPO and it used an extensive public involvement process to develop guiding principles, strategies, and recommendations for funding and coordinating transportation services. A full update of the Human Services Transportation Plan along with a community transportation survey to reach MLI, elderly and disabled populations will be undertaken in 2016 to implement MAP-21 guidance.

7.1.6 Public Involvement

Public Participation Policy

Public participation for all transportation processes is based on the Winston-Salem Urban Area MPO's Public Participation Policy (PPP) that was revised and adopted March 2014. The revised PPP

includes direct references to the Program of Projects for transit providers, increases the public review period for the PPP from 30 to 45 days, updates Federal, State and other requirements for public involvement, specifically addresses Limited English Proficiency (LEP) populations and references the LEP Plan adopted by the MPO in March 2014, and reorganizes and removes the former “three tier” hierarchy of public involvement in favor of the following:

- a. **General Guidelines** covering all public involvement activities.
- b. **Strategy and Policy Toolkit** providing strategic ideas for improving our public participation methods. The toolkit ideas are not mandatory, but provide guidance for additional outreach especially for Minority and Low Income and/or LEP populations.
- c. **Implementation Guidelines** providing specific requirements for public processes, including detailed requirements for each of the major plans regularly produced by the MPO.

The goals and objectives of the Public Participation Policy include:

1. Bring a broad cross-section of the public into the policy and planning decision-making process.
2. Make special efforts to increase the involvement by groups of people who do not generally participate, particularly low-income and minority populations.
3. Provide opportunities to participate in developing the plans and programs for their communities.
4. Make information on government activities widely available to the public.
5. Maximize the use of communications technology to facilitate the exchange of information, including the MPO web site and other electronically accessible formats (CDs, e-mail, etc.).
6. Ensure that technical information is available in an understandable form and all segments of the population are afforded access to this information.

Targeted Strategies - Where a Public Participation Policy strategy is intended to help reach minority or low-income communities, it is marked with this symbol in the document: ☞

During the adoption of transportation plans, policies and programs, the MPO will ensure fair and full participation in the transportation planning process by all citizens who may be potentially affected and be consistent with the Environmental Justice Executive Order guidance from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). The MPO will identify low-income and minority populations by traffic analysis zones or by census tracts, so the effects or burdens of transportation programs and on these groups can be reviewed and addressed to ensure transportation programs are distributed throughout the planning area fairly. Public outreach to low-income and minority populations will be made by maintaining a distribution mailing list of community organizations and leaders, inviting them to public meetings or workshops and speaking at community meetings. Public notices for adoption of new or major updates to the MTP or MTIP will be placed in newspapers and media outlets to reach low-income, minority and Spanish speaking communities. To assure adequate participation of these groups, the MPO shall use tools such as advisory boards whose members represent low-income or minority groups, target mailing list, workshops, and public notices in minority or low-income targeted media outlets. The MPO shall also make a special effort to seek out and consider the needs of individuals or communities with low income, low-literacy or limited English proficiency by engaging faith-based groups, going door-to-door in communities, and making translation services available for meetings without requiring a request, and advertise them publicly.

Special accommodations for MLI populations in the public participation process and project impact analysis shall be conducted on a project-by-project case by the project manager, whether it be MPO staff, NCDOT, or a consultant. The project manager shall use this EJ plan as a reference and guide for complying with the MPO's policy.

Transportation Survey

In 2007, the WSDOT conducted a Transportation Services Survey to identify the needs of MLI populations in the MPO area by various methods. The MPO has used the information gathered from the survey to prioritize issues and needs for the MLI population. The MPO will undertake a new set of surveys during 2016, in conjunction with the update of the Human Services Coordination Plan, to identify a wider range of MLI, ADA and transit dependent and elderly population needs.

7.1.7 Limited English Proficiency

The Winston-Salem MPO has developed a demographic profile of the Limited English Proficiency population needing and/or likely to need to be served. Based on 2008-2012 American Community Survey (ACS) data, 9.2% of the population of the Winston-Salem MPO is foreign born with 47.0% of those entering the MPO after 2000. Using the ACS Data we see the Region of Birth of Foreign Born Population is as follows:

Europe	8.8%	Oceania	0.4%
Asia	17.4%	Latin America	68.7%
Africa	3.2%	North America	1.5%

12.6 % of the population 5 years of age or older in the Winston-Salem MPO speaks a language other than English at home and of that 50.0% speak English less than “very well.”

Spanish	9.6%	Asian & Pacific Island languages	1.1%
Speak English less than “very well”	5.4%	Speak English less than “very well”	0.4%
Indo-European languages	1.6%	Other languages	0.3%
Speak English less than “very well”	0.4%	Speak English less than “very well”	0.0%

The total Hispanic population in the Winston-Salem MPO is 42,790 which is 10.7% of the total MPO population. The combined LEP population is less than 7% of the total population. In 2001, a supplementary survey conducted by the US Census Bureau identified that 33% of Spanish speakers and 22.4% of Asian and Pacific Island language speakers reported that they spoke English “not well” or “not at all.” With the limited ability to read, write or speak English they are considered limited English proficient (LEP). To ensure that LEP persons may effectively participate and benefit from federally funded programs, Executive Order 13166 was issued under Title VI by President Clinton in August 2000, requiring recipients of federal funds to provide meaningful access to LEP populations.

In order to comply with Executive Order 13166 and the NCDOT OCR review, the WS MPO conducted a four-factor analysis for the entire MPO planning area and developed an MPO Limited English Proficiency Plan that was adopted in March 2014. The LEP Plan ensures that Implementation Plan for Language Assistance for LEP Persons will 1) Identify LEP individuals who need language assistance; 2) utilize multiple language assistance measures; 3) provide staff training in assisting the Limited English Proficient community; 4) provide adequate and appropriate notice to LEP persons; and 5) monitor and evaluate the WS MPO performance as well as update the LEP Plan on a regular basis. Training measures include an employee incentive program to learn foreign languages and staff diversity training on LEP issues and cultural sensitivity. The plan can be found in the **Appendix**.

7.1.8 Future Initiatives

In a review of current studies and literature on Environmental Justice measures to evaluate benefits and burdens to MLI populations, as well as to mitigate adverse impacts on disadvantaged communities, the Winston-Salem MPO proposes to continue gathering data and analyzing both MLI and non-MLI populations, transportation service equity through travel studies, financial allocation to transportation projects and programs and safety. To develop a clearer picture of the MPO’s progress, the following future initiatives:

Service Equity

- Through Socio Economic Travel Demand Model data and zoning permits, the MPO will monitor commercial and employment development in MLI populated areas.
- In conjunction with the development of the Metropolitan Transportation Plan and the fiscally constrained funding program, the MPO will map the per capita investment of transportation infrastructure construction and maintenance dollars by TAZ to determine equity in the distribution of transportation dollars.
- Begin a pilot study to determine how projects, programs, and services benefit or burden (i.e., property values/environmental conditions/travel time/accessibility) the MLI populated areas.

Accessibility

- With the MPO base mapping of existing and future Bicycle, Pedestrian and Greenway projects, bond projects, and community requests, identify and prioritize locations where sidewalk and other ADA accommodations are needed in the MLI populated areas.
- Along with the implementation of the Comprehensive Operational Analysis for the Winston-Salem Transit System and Piedmont Authority for Regional Transportation stops, evaluate transit service stops for sidewalk accessibility and ADA compliance.

Safety and Security

- On an annual basis, gather and evaluate data on vehicular, bicycle and pedestrian crashes throughout the MPO and correlate to the MLI populated areas.

Social, Environmental, and Aesthetics

- As a part of MTIP project environmental analysis, evaluate and propose mitigation measures for noise, visual and physical obstructions to and from the MLI populated areas.

Public Involvement

- Seek out and continue to attend cultural and community events to reach out to MLI and LEP populations in convenient, accessible locations such as community festivals, church and sporting events and local farmer's markets.
- Prior to beginning the development of the MTP, survey MLI populations on transportation issues to measure satisfaction, concerns and issues to include in the development of mitigation strategies.

Mobility

- Work with the Piedmont Authority for Regional Transportation and the regional MPO partners to upgrade the Travel Demand Model (TDM) to include a more robust transit component with linkages to MLI socio-economic data.
- On a semi-annual basis, perform travel time studies to determine inequities for major employment destinations such as the hospital or key shopping areas.
- To develop a base line of service coverage and travel time parameters, evaluate the transit trip travel time before and after the implementation of the upcoming transit fixed route service and schedule changes for major employment destinations such as the hospital or key shopping areas.

Appendix References

Documents

2012 Certification Review Final Report January 2013
Winston-Salem MPO Limited English Proficiency Plan March 2014
Winston-Salem MPO Title VI Policy, Assurances and Complaint Procedures
Winston-Salem MPO Title VI Review by NCDOT Office of Civil Rights August 2013
Winston-Salem MPO Title VI Compliance Closeout by NCDOT Office of Civil Rights August 2014
NCDOT MPO Coordinator Training Powerpoint
Environmental Justice Travel Study 2015 and Data
Winston-Salem Transit Authority Bus Stop and Shelter Improvements and Categorical Exclusion