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# Environmental Justice Plan

2017 • 2019

# Office of Civil Rights

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## Contents

<b>I. Introduction</b> .....	<b>1</b>
A. Purpose.....	1
B. Overview of Federal Regulations and Populations Addressed.....	1
C. Transportation Planning Approach: Incorporating Environmental Justice.....	4
D. Project-Level Analysis .....	5
<b>II. Public Involvement Analysis and Outreach</b> .....	<b>5</b>
<b>III. Resources:</b> .....	<b>6</b>
<b>Appendix A: Title VI and Nondiscrimination Related Authorities</b> .....	<b>7</b>
<b>Appendix B – ITD Environmental Evaluation Form 0654</b> .....	<b>8</b>
<b>Appendix C – Title VI and EJ Program Area Questionnaire</b> .....	<b>8</b>

**This document is available online at**

**[Environmental Justice Plan](#)**

# I. Introduction

## A. Purpose

Title VI of the 1964 Civil Rights Act and President's Executive Order (EO) 12898 Environmental Justice (EJ) identify specific populations that are a special focus in transportation planning and project development. Specific reporting requirements within these regulations make participation in transportation planning and project development more inclusive of diverse communities in planning and project areas. By including the concerns of these special populations, the needs of all groups and individuals regardless of race, age, income, etc., can be identified and addressed.

To meet the needs of the Title VI and EO 12898, the Idaho Transportation Department (ITD) has developed this Environmental Justice Plan and the ITD [Environmental Process Manual, Section 2000](#). These two plans provide guidance for ITD staff, public, consultants and jurisdictional partners when conducting Title VI and EJ activities for the transportation planning and project process. The approach to identify, engage, and address the needs of protected populations in the development of ITD statewide policy, facility, local and regional transportation system, and similar long-range planning plans are also addressed in these plans. ITD's goal is to be inclusive of all groups, and achieve greater consistency and more systematic Title VI and EJ project analyses and reporting.

## B. Overview of Federal Regulations and Populations Addressed

Title VI of the 1964 Civil Rights Act and the President's Executive Order 12898 (1994) directs federal efforts to make the planning and decision-making processes more inclusive. The EO defines Federal Actions for addressing Environmental Justice in Minority Populations and Low-Income Populations (EJ); both aim to distribute the impacts and benefits of projects and programs receiving federal financial assistance, equitably.

Title VI and the associated Code of Federal Regulations for Transportation (49 CFR, Subtitle A, Part 21) affirms that any program or activity receiving federal financial assistance may not exclude or discriminate against groups or individuals based on their race, color, national origin, sex, age, and disability. In particular, a person may not be denied any benefit of the program, denied the opportunity to participate in planning or advising for the program, or subjected to discrimination under the program (including the siting of facilities) based on race, color, national origin, sex, age, and disability. The Federal Highway Administration (FHWA) includes additional nondiscrimination authorities under the broader Title VI Program (see Appendix A).

The EO 12898 provides guiding principles for all transportation programs as summarized below and found at the following link: [Department of Transportation Environmental Justice Strategy](#).

- 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.

On May 2, 2012 US DOT issued DOT Order, 5610.2(a); the purpose of the Order was to describe Department-wide actions for addressing EJ in minority and low-income populations during all phases of a project. The Order may be found at [DOT Order 5610.2\(a\)](#).

The updated Order clarifies certain aspects of the EO 12898 of 1994 including the definitions of “minority” populations. The revisions clarify the distinction between a Title VI analysis and an EJ analysis conducted as part of a NEPA process. It affirms the importance of considering EJ principles as part of early project planning activities to avoid disproportionately high and adverse impacts to EJ populations.

In accordance with the revised Order 5610.2(a), EJ populations are defined as:

- **Black** – a person having origins in any of the black racial groups of Africa.
- **Hispanic or Latino** – a person of Mexican, Puerto Rican, Cuban, Central, or South American, or other Spanish culture or origin, regardless of race.
- **Asian American** – 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 or South America (including Central America) who maintains cultural identification through tribal affiliation or community recognition.
- **Native Hawaiian and Other Pacific Islander** – people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific islands.
- **Low-Income Population** – any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or

Native Americans) who would be similarly affected by a proposed USDOT program, policy, or activity.

- **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 would be similarly affected by a proposed USDOT program, policy, or activity.

The Order specifies:

“Statutes governing USDOT operations will be administered so as to identify and avoid discrimination and avoid disproportionately high and adverse effects on minority populations and low-income populations by:

1. Identifying and evaluating environmental, public health, and interrelated social and economic effects of USDOT programs, policies, and activities;
2. Proposing measures to avoid, minimize, and/or mitigate disproportionately high and adverse environmental and public health effects and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by USDOT programs, policies, and activities, where permitted by law and consistent with the EO;
3. Considering alternatives to proposed programs, policies, and activities, where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts, consistent with the EO; and
4. Eliciting public involvement opportunities and considering the results thereof, including soliciting input from affected minority and low-income populations in considering alternatives.”

In summary, Title VI and EJ work in tandem to engage protected populations in the planning and decision-making processes, avoid adverse impacts to protected populations, resulting in fairly distributed benefits of transportation projects and programs.

The demographic profiles of Title VI and EJ communities vary throughout the state. The specific populations identified for special considerations during a planning process will depend on the nature of the project and the size, location, and special characteristics of the study area.

The goal of Title VI/Environmental Justice (EJ) is to ensure that services and benefits are fairly distributed to all people, regardless of race, national origin, or income, and that they have access to meaningful participation. Detailed demographic analysis that identifies the appropriate type of outreach is critical to ensure a consistent approach in the planning and project development process.

ITD's planning and project development process includes Title VI and EJ considerations when determining the site or locating projects to ensure non-discrimination. Identifying existing Title VI and EJ populations is required in planning projects. Opportunities exist in both the project-scoping phase and in statement of work language to identify the overlap and differences in Title VI and EJ populations. Addressing Title VI and EJ-related questions during project scoping and performing demographic analysis early in the planning process is critical. After documenting the protected populations in the study area, planners can then use this information to develop a meaningful public involvement plan to reach specific groups, as well as to provide the baseline data for the existing and future conditions analyses and alternatives analysis.

The Title VI and EJ planning approach provides a methodical way to ensure; Title VI and EJ goals are acknowledged as part of project scoping; protected populations are identified early in a project; and that reporting elements are consistent at the conclusion of a project. The approach is organized into four phases – scoping, outreach, analysis, and reporting – and specific steps under each of these phases are described to help planners and project managers address Title VI and EJ regulations. ITD Environmental Evaluation Form 0654 is completed to document how each project has identified and considered Title VI and EJ populations in a way that is meaningful and appropriate to the type of project and circumstances within the study area.

ITD's Office of Civil Rights Program Manager/Title VI/Nondiscrimination Coordinator incorporates information received from each PAC regarding Title VI/EJ activities into a comprehensive report Title VI Accomplishment Report. The Title VI and EJ Program Area Questionnaire (Appendix C) helps standardize data collection to fulfill statewide Title VI & EJ reporting requirements.

### **C. Transportation Planning Approach: Incorporating Environmental Justice**

ITD addresses EJ throughout the planning, programming, environmental, and preliminary engineering phases of project scoping and development. During the project planning process, effects on EJ populations are identified. In addition to a project-by-project analysis, ITD is responsible for ensuring that its overall Transportation Investment Plan does not disproportionately distribute benefits or

negative effects to any EJ population. ITD's 5-year Transportation Plan is located at: [http://itd.idaho.gov/NewsandInfo/Docs/2013\\_Five\\_Year\\_Plan.pdf](http://itd.idaho.gov/NewsandInfo/Docs/2013_Five_Year_Plan.pdf).

Public meetings are also held to ensure an EJ community potentially impacted by a project has an opportunity for input during the NEPA process.

#### **D. Project-Level Analysis**

EJ is reviewed for every project however; the complexity of a project will determine the extent of EJ analysis required. ITD [Environmental Process Manual, Section 2000](#) provides a methodology for analyzing EJ communities per project. The analysis typically involves identifying populations then analyzing whether the risk of exposure by a minority population or low-income population to an environmental hazard is significant and appreciably exceeds, or is likely to appreciably exceed, the risk or rate to the general population or another appropriate comparison group.

## **II. Public Involvement Analysis and Outreach**

In order to ensure a strong level of public involvement during the planning process, knowing the characteristics of the community impacted is necessary. It is helpful to know the demographics of the study area and assess community factors that may translate to local transportation-related needs. The [ITD Public Outreach Planner](#) provides guidance in completing the public involvement analysis to develop an effective public outreach/communication plan [ITD Guide to Public Involvement](#). The purpose of the communication plan is to provide an overall framework for managing and coordinating the wide variety of communications that will directly, or indirectly, take place as part of a project. Developing and following a Public Involvement Plan will help provide relevant, accurate, consistent information to the project stakeholders.

Demographic information gathered during the scoping phase informs planners of the Title VI/EJ populations in the study area. The project public involvement plan includes targeted outreach strategies that utilize data from the [US Census](#) data and other tools like the [EPA Mapper](#) on these specific groups. The Decennial Census (DC) is conducted every ten years and the [American Community Survey](#) (ACS), is conducted in the years between the Decennial Census. These efforts provide extensive demographic data. ACS data tends to be available at larger, less detailed levels of geography than Decennial Census data. These differences present a trade-off between data that is more recent and data that is more detailed.

It may also be determined that contacting local public agencies will provide relevant information regarding facilities used by Title VI and EJ populations. There may be situations where census data, field observations, and other existing conditions do not provide a clear picture regarding the presence or needs of Title VI and EJ populations. In

these cases, it may be appropriate to contact select community organizations about potential Title VI populations in the study area to further identify key transportation facilities and services accessed/used by these populations. The objective is to incorporate Title VI and EJ inquiry into early project tasks where appropriate and, for this step, to formally document what is known about Title VI and EJ populations within the study area as part of the project's existing conditions analysis.

ITD's mission and measures for assessing existing and future conditions and needs are safety, mobility, and economic opportunity. To address multimodal "gaps" in services and facilities that may affect transportation system accessibility (e.g. lack of continuity reduces accessibility for populations who cannot drive) Title VI and EJ populations data can be used as a factor in determining whether solution alternatives have a significant or disproportionately adverse effect on Title VI and EJ populations.

Where a determination has been made that there are no significant concentrations of protected populations in the study area, the needs of the transportation disadvantaged could be included in the evaluation criteria such as, safety, property impacts, accessibility, and mobility.

### **III. Resources:**

**Appendix A – Title VI and Nondiscrimination Related Authorities**

**Appendix B – ITD Environmental Evaluation Form 0654**

**Appendix C – Title VI and EJ Program Area Questionnaire**



## **Appendix A: Title VI and Nondiscrimination Related Authorities**

Title VI of the Civil Rights Act of 1964 prohibits discrimination in Federal and Federally assisted projects and programs based upon race, color, and national origin. Since 1964, additional statutes prohibit discrimination based upon sex (Federal-aid Highway Act of 1973), age (The Age Discrimination Act of 1975), and disability (Section 504 of the Rehabilitation Act of 1973 and Americans with Disabilities Act of 1990). Collectively FHWA defines a Title VI Program to prohibit discrimination based upon race, color, national origin, sex, age, or disability. In addition, since the Executive Orders regarding Environmental Justice (Executive Order #12898) and Limited English Proficiency (Executive Order #13166) are non-discriminatory in their intent, while they are not statutes and someone cannot sue because of them, FHWA includes the E.O.s under the Title VI Program.

While Executive Orders and other guidance do not directly apply to Recipients, they do direct Federal agencies to take specific actions concerning federally assisted programs and activities of their Recipients. As a result, this requires these agencies to ensure that ITD undertake certain activities. As an example, Executive Order 12898, 3 C.F.R. 859 (1995), entitled “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” emphasizes that Federal agencies have a duty to use existing laws to achieve Environmental Justice, in particular Title VI, to ensure nondiscrimination for low-income and minority populations. Executive Order 13166, 3 C.F.R. 289 (2001) on Limited English Proficiency, according to the U.S. Department of Justice in its Policy Guidance Document dated August 16, 2000 (65 Fed. Reg. at 50123), clarifies the responsibilities associated with the application of Title VI’s prohibition on national origin discrimination when providing information only in English to persons with limited English proficiency.

List of Title VI/Nondiscrimination Authorities:

Title VI of the Civil Rights Act of 1964 (42 USC § 2000d, 78 stat. 252) prohibits discrimination in federally funded programs on the basis of race, color, and national origin.

Federal-Aid Highway Act of 1973 (23 USC § 324): amended Title VI to prohibit discrimination on the basis of sex in Federal-Aid highway programs.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC § 4601): prohibits unfair and inequitable treatment of persons as a result of projects that are undertaken with Federal Financial Assistance.

Age Discrimination Act of 1975, as amended (42 USC § 6101): prohibits discrimination in federally funded programs on the basis of age.

Civil Rights Restoration Act of 1987 (Public Law 100-259 March 1988) amended Title VI of the 1964 Civil Rights Act to make clear that discrimination is prohibited throughout all the operations of an agency if any part of the agency receives Federal assistance.

Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

Executive Order 13166 (Limited English Proficiency): Improving Access to Services for Persons with Limited English Proficiency.

23 CFR Part 200: FHWA Title VI Program and Related Statutes – Implementation and Review Process.

Section 504 of the Rehabilitation Act of 1973, (29 USC § 794) as amended: prohibits discrimination on the basis of disability.

Americans with Disabilities Act of 1990, (42 USC § 12101): prohibits discrimination on the basis of disability.

The National Environmental Policy Act of 1969 (42 USC § 4321) prohibits disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

49 CFR Part 21: Nondiscrimination in Federally-Assisted Programs of The Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964.

49 CFR Part 27: Nondiscrimination On the Basis of Disability in Programs or Activities Receiving Federal Financial Assistance.

49 CFR Part 28: Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Department of Transportation.

49 CFR Part 37: Transportation Services for Individuals with Disabilities – ADA.


28 CFR Part 35: Discrimination on the Basis of Disability in State and Local Government Services.

28 CFR Part 50.3: Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964.

23 CFR Part 771: Environmental Impact and Related Procedures.

May 2012 DOT Order 5610.2(a): Final DOT Environmental

# Appendix B – ITD Environmental Evaluation Form 0654



ITD 0654 (Rev. 10-10) **Environmental Evaluation**

Key Number		Project Number		Program	Project Name		Date
District	City/County			Route Number	Beginning Milepost	Ending Milepost	Program Year

Acreage of New Public R/W	Acreage of New Private R/W	(Discuss the existing use of R/W to be acquired, plus adjacent land use, zoning, development plans, etc. on attached Environmental Summary Sheet)
Tribal Impact <input type="checkbox"/> Cultural <input type="checkbox"/> Archeological <input type="checkbox"/> Reservation <input type="checkbox"/> None		Public Interest Expected? <input type="checkbox"/> Yes <input type="checkbox"/> No
Air Quality <input type="checkbox"/> Attainment Area <input type="checkbox"/> Non-Attainment Area <input type="checkbox"/> CO <input type="checkbox"/> PM   Exempt Project <input type="checkbox"/> Yes <input type="checkbox"/> No		
Type One Project (i.e., New Location, Substantial Alignment Change, Addition of a Through-Traffic Lane)		<input type="checkbox"/> Yes <input type="checkbox"/> No
Construction Impacts Requiring Special Provisions (Enter Details on Reverse Side)		<input type="checkbox"/> Yes <input type="checkbox"/> No
Program Year ADT   DHV   % Trucks   Posted Speed		Design Year ADT   DHV   % Trucks   Posted Speed
Distance of Nearest Noise Receptor to Centerline Existing   Proposed		

**Project Purpose and Benefits**  
 Double mark (xx) only the item that best describes the Primary Reason for Proposing this Project  
 Single mark (x) all Other Relevant items

<input type="checkbox"/> Maintain/Improve User Operating Conditions <input type="checkbox"/> Maintain/Improve Traffic Flow <input type="checkbox"/> Time Savings <input type="checkbox"/> Increase Capacity <input type="checkbox"/> Reduce Congestion <input type="checkbox"/> Reduce Hazard(s) <input type="checkbox"/> Reduce Highway User Operating Costs <input type="checkbox"/> Other, List (e.g., Driver Convenience and Comfort regarding Rest Area Projects)	<input type="checkbox"/> Enhance Accessibility for the Disabled/Safety <input type="checkbox"/> Enhance Pedestrian Safety and/or Capacity <input type="checkbox"/> Enhance Bicycle Safety and/or Capacity <input type="checkbox"/> Traffic Composition Enhancement (e.g., Truck Route, HOV Lane, Climbing Lane) <input type="checkbox"/> Visual/Cultural Enhancement (e.g., Landscaping, Historic Preservation) <input type="checkbox"/> Environmental Enhancement (e.g., Air Quality, Noise Attenuation, Water Quality) <input type="checkbox"/> Economic Prudence (e.g., Repair Less Expensive than Replacement, B/C Ratio)
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**Check Any of the Following That Require Avoidance, Minimization, or Discussion** (If Yes, describe in the Environmental Document or CE)

	Yes	No		Yes	No
1. Noise Criteria Impacts*	<input type="checkbox"/>	<input type="checkbox"/>	17. Threatened/Endangered Species*	<input type="checkbox"/>	<input type="checkbox"/>
2. Change in Access or Access Control	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Listed <input type="checkbox"/> Proposed	<input type="checkbox"/>	<input type="checkbox"/>
3. Change in Travel Patterns	<input type="checkbox"/>	<input type="checkbox"/>	18. Air Quality Impacts	<input type="checkbox"/>	<input type="checkbox"/>
4. Neighborhood or Service Impacts	<input type="checkbox"/>	<input type="checkbox"/>	19. Inconsistent With Air Quality Plan	<input type="checkbox"/>	<input type="checkbox"/>
5. Economic Disruption	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> SIP <input type="checkbox"/> TIP		
6. Inconsistent W/Local or State Planning	<input type="checkbox"/>	<input type="checkbox"/>	20. Stream Alteration/Encroachment**	<input type="checkbox"/>	<input type="checkbox"/>
7. Minorities, Low Income Populations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> IWDR <input type="checkbox"/> F&G <input type="checkbox"/> COE (404)		
8. Displacements*	<input type="checkbox"/>	<input type="checkbox"/>	21. Flood Plain Encroachment*	<input type="checkbox"/>	<input type="checkbox"/>
9. Section 4(f) Lands-DOT Act 1988* (i.e., Public Parks/Rec Areas/Trails, Wildlife/Waterfowl Refuges, Wild or Scenic Rivers, Historic Sites/Bridges, Archaeological Resources)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Longitudinal <input type="checkbox"/> Traverse		
10. LWCF Recreation Areas/6(f) Lands*	<input type="checkbox"/>	<input type="checkbox"/>	22. Regulatory Floodway	<input type="checkbox"/>	<input type="checkbox"/>
11. Section 108-Nat. Hist. Preserv. Act*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> PE Cert. & FEMA Approval <input type="checkbox"/> Revision		
12. FAA Airspace Intrusion**	<input type="checkbox"/>	<input type="checkbox"/>	23. Navigable Waters**	<input type="checkbox"/>	<input type="checkbox"/>
13. Visual Impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> CG (Sec 9) <input type="checkbox"/> COE (Sec 10) <input type="checkbox"/> Dept. Lands		
14. Prime Farmland*, Parcel Splits	<input type="checkbox"/>	<input type="checkbox"/>	24. Wetlands*	<input type="checkbox"/>	<input type="checkbox"/>
15. Known/Suspected "Hazmat" Risks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Jurisdictional** (404) <input type="checkbox"/> Non-Jurisdictional		
16. Wildlife/Fish Resources/Habitat**	<input type="checkbox"/>	<input type="checkbox"/>	25. Sole Source Aquifer	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/> Exempt Project <input type="checkbox"/> Non-Exempt**		
			26. Water Quality, Runoff Impacts	<input type="checkbox"/>	<input type="checkbox"/>
			27. NPDES-General Permit	<input type="checkbox"/>	<input type="checkbox"/>
			(If no, complete sediment-erosion control plan)		

\*If yes to these items, supplemental reports or documentation are required (e.g., Relocation Report; Wetlands Determination/Finding; Fish and Wildlife Species List Update; SCS Form AD-1006, *Biological Assessment*, etc.)  
 \*\*If yes to these items, a letter of input is required from the appropriate agency.

Page 1 of 2

**Recommendation**

<input type="checkbox"/> A. The project does not individually or cumulatively have a significant adverse effect on the human environment (Categorical Exclusion) <input type="checkbox"/> 23 CFR 771.117(c), i.e., Type 1 - ITD Approval <input type="checkbox"/> 23 CFR 771.117(d), i.e., Type 2 - Programmatic - ITD Approval <input type="checkbox"/> 23 CFR 771.117(d), i.e., Type 3 - FHWA Approval
<input type="checkbox"/> B. There is insufficient information to support A above or no precedent exists. (Environmental Assessment)
<input type="checkbox"/> C. The project will result in a significant effect on the human environment. (Environmental Impact Statement)

Prepared By (Consultant, District Environmental Planner, or LHTAC Signature*)	Date
Reviewed By (District Environmental Planner, Project Development Engineer, or LHTAC Signature*)	Date

**\*One Signature by a Planner and one by Engineer or Consultant**

Construction Impacts Requiring Special Provisions
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Project Description (if not attached)
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# Appendix C – Title VI and EJ Program Area Questionnaire

## TITLE VI PROGRAM AREA REVIEW QUESTIONNAIRE FY (20XX) ENVIRONMENTAL

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The information requested is for the reporting period July 1, 20XX through June 30, 20XX. Reviewing actual documentation of your activities may be necessary in determining compliance, in addition to your narrative responses to the questions below. You may provide electronic documents or a link to your website for documents and materials as an alternative to providing a paper copy.

**If you believe that a question does not pertain to your activities during the previous year, please state and provide the reason why it does not pertain. Please do not use ‘not applicable’ or ‘N/A’. Do not leave questions blank.**

### ENVIRONMENTAL PROJECTS

1. For the reporting period, please indicate the total number of environmental projects that were completed:
  - a. Of those, please provide a breakdown of the type/amount of projects:
    - i. Categorical Exclusion
    - ii. Environmental Assessment
    - iii. Environmental Impact Statement
2. How is the evaluation process for environmental justice monitored at the district level, including local projects? How is it determined that the EJ evaluation was done using appropriate demographic statistics for the impact area of the project?
3. Summarize any Environmental Assessments or Environmental Impact Statements where minority and low-income populations were adversely impacted and any mitigation measures taken as a result:
4. Were any revisions made to the Environmental Evaluation (ITD-654) form during the reporting period?  Yes  No

**ACCOMPLISHMENTS**

5. Were there any instances where Title VI issues were identified and discrimination prevented?  Yes  No

6. If yes, describe action taken.

**TRAINING**

7. Did anyone from Environmental receive any Title VI or Environmental Justice training during this reporting period?  Yes  No

Employee Name	Course Attended	Date Attended

**COMPLAINTS**

8. Did Environmental receive any Title VI-related complaints this reporting period?  Yes  No

9. If yes, please detail and describe action taken.

**COMPLIANCE**

10. Within the Environmental Program section list all individual(s) responsible for monitoring, complying, and enforcing Title VI regulations and requirements.