

20.0 Environmental Justice

20.1. Introduction

This chapter defines the environmental justice (EJ) populations pertinent to the Long Bridge Project (the Project), and defines the regulatory context, methodology, and Affected Environment. For each Action Alternative and the No Action Alternative, this chapter assesses the potential short-term and long-term impacts on EJ populations. This chapter also discusses proposed avoidance, minimization, and mitigation measures to reduce adverse impacts of the Project.

Minority populations, as defined in Federal Transit Administration (FTA) Circular 4703.1, are any readily identifiable group or groups of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed or transient persons, such as migrant workers or Native Americans, who will be similarly affected by the proposed project.¹ A minority population includes persons who are American Indian or Alaskan Native, Asian American, Native Hawaiian or Other Pacific Islander, African American (not of Hispanic Origin), and Hispanic or Latino. This EJ analysis also considers minority to include persons identified as being either “some other race” or “two or more races” in the United States Census data.

A **low-income person**, as defined in FTA Circular 4703.1, is one whose median household income is at or below the United States Department of Health and Human Services (HHS) poverty guidelines. A **low-income population** is any readily identifiable group or groups of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed or transient persons who will be similarly affected by a proposed United States Department of Transportation (USDOT) program, policy, or activity.

20.2. Regulatory Context and Methodology

This section describes the most pertinent regulatory context for evaluating impacts to EJ populations and summarizes the methodology for evaluating current conditions and the probable consequences of the alternatives. This section also describes the Study Area. **Appendix D1, Methodology Report**, provides the complete list of laws, regulations, and other guidance considered, and a full description of the analysis methodology.

20.2.1. Regulatory Context

Executive Order (EO) 12898 of February 11, 1994: *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, directs Federal agencies to take appropriate and necessary steps to identify and address disproportionately high and adverse environmental effects of Federal agency actions (including transportation projects) on minority and low-income populations.²

¹ FTA Circular 4703.1

² EO 12898

33 The USDOT *Order to Address Environmental Justice in Minority Populations and Low-Income Populations*
34 sets forth the USDOT policy to consider EJ principles in all USDOT programs, policies, and activities.³ It
35 describes how the objectives of EJ are integrated into planning and programming, rulemaking, and
36 policy formulation. This Order also requires that any activities that will have a disproportionately high
37 and adverse effect on populations protected by Title VI (“protected populations”) will only be carried
38 out if:

- 39 1) A substantial need for the activity exists, based on the overall public interest; and
- 40 2) Alternatives that would have less adverse effects on protected populations (and that still satisfy
41 the need identified in item 1 above), either
 - 42 a) Would have other adverse social, economic, environmental, or human health impacts
43 that are severe; or
 - 44 b) Would involve increased costs of extraordinary magnitude.

45 Because FTA is a Cooperating Agency, the EJ analysis for the Project is also consistent with FTA guidance.
46 FTA Circular 4703.1, *Environmental Justice Policy Guidance for FTA Recipients*, provides guidance for
47 incorporating EJ principles into plans, projects, and activities subject to adoption of or approval by FTA.⁴

48 **20.2.2. Methodology**

49 As shown in **Figure 20-1**, the Local Study Area for the EJ analysis accounts for effects that may occur
50 outside the area of direct impacts, such as changes in air quality, noise, vibration, and land uses that
51 may adversely or disproportionately affect low-income or minority communities. The Local Study Area
52 includes the Project Area, which spans from the midblock between 9th Street SW and 10th Street SW in
53 the District and Long Bridge Park in Arlington County, Virginia, as well as 0.5 miles immediately adjacent
54 to the Project Area. The United States Census blocks and block groups are the smallest geographic units
55 for which the demographic data collected for this analysis are available. Therefore, some analyses that
56 rely on United States Census information capture data that extends beyond the Local Study Area. The
57 0.5-mile radius captures the extent of indirect impacts that may be noticeable. This Local Study Area
58 captures all relevant impacts. Therefore, a wider Regional Study Area is not necessary for this topic.

59 The documentation of the Affected Environment included determining the characteristics of the general
60 population and describing the characteristics of the potentially impacted population within the Local
61 Study Area. The analysis used the United States 2010 Census as the data source for the identification of
62 minority populations. The analysis quantified minority populations at the block level, which is the
63 smallest geographic unit for which race and ethnicity data are available. The American Community
64 Survey (ACS) 5-year average data for 2011–2015 served as the data source for the identification of
65 low-income populations. The analysis quantified low-income populations at the block group level, which
66 is the smallest geographic unit for which low-income population data are available.

³ USDOT Order 5610.2(a)

⁴ FTA Circular 4703.1

67 **Figure 20-1** | Local Study Area for Environmental Justice



68

69 The analysis used additional data sources to provide more recent indications of low-income populations
70 within the Local Study Area. The analysis used the District’s Geographic Information Systems data on
71 affordable housing production and preservation projects (updated November 20, 2017) to identify
72 affordable housing in the portion of the Local Study Area within the District. For the portion of the Local
73 Study Area within Virginia, the analysis geocoded the list of apartment complexes offering affordable
74 housing from Arlington County’s Affordable Housing website. Where the analysis found minority or
75 low-income populations to be present in the Local Study Area, FRA and DDOT conducted outreach to
76 solicit feedback from those populations as described in **Section 20.7, Coordination with Environmental**
77 **Justice Communities.**

78 The EJ impacts analysis evaluated both the No Action and the Action Alternatives to determine whether
79 the respective alternatives would result in disproportionately high and adverse direct and indirect
80 impacts to minority and low-income populations. Based on FTA guidance, the evaluation considered the
81 following criteria in determining whether the activity would result in a “disproportionately high and
82 adverse effect on human health or the environment”:⁵

- 83 • Would the alternative’s adverse impacts be predominantly borne by minority or low-income
84 populations? This will be determined by identifying whether adverse impacts are concentrated
85 in minority or low-income communities.
- 86 • Would adverse impacts to minority or low-income populations be appreciably more severe or
87 greater in magnitude than those suffered by non-minority or low-income populations?
- 88 • Does the Project affect a resource that is especially important to an EJ population? For example,
89 does the Project affect a resource that serves an especially important social, religious, or cultural
90 function for an EJ population?
- 91 • What would be the effect of the alternative’s offsetting benefits when considering these
92 impacts?
- 93 • What would be the effect of mitigation measures that would be incorporated into the
94 alternative and any other enhancements or betterments that would be provided instead of
95 mitigation when considering these impacts?

96 The EJ analysis considered the geographical distribution of the potentially adverse impacts and whether
97 they would occur in areas with a high proportion of minority or low-income persons (based on the
98 demographic data presented in the Affected Environment sections); fall mostly on facilities or activities
99 of cultural or economic importance to such populations; or otherwise affect minority or low-income
100 persons more than the general population. This approach addressed direct and indirect impacts from
101 the operation of Long Bridge after the completion of the Project and impacts from the construction of
102 the Project. The analysis also considered mitigation measures, as well as any beneficial impacts that may
103 offset disproportionate adverse effects on EJ populations.

⁵ FTA Circular 4703.1

104 **20.3. Affected Environment**

105 This section summarizes the existing conditions for EJ populations. For a complete description of the
106 Affected Environment, see **Appendix D2, Affected Environment Report**.

107 This section presents an overview of demographic data (race and ethnicity and poverty status) for the
108 United States Census blocks and block groups within the Local Study Area. The analysis used this
109 information to identify the presence of EJ populations. **Chapter 17, Social and Economic Resources**, also
110 presents demographic information.

111 **20.3.1. Minority Populations**

112 The analysis evaluated United States 2010 Census data to determine the potential for the presence of
113 minority populations within the Local Study Area. While older than the ACS data, these data are
114 available at a finer scale (Census blocks) and can therefore provide a more accurate assessment of the
115 locations of minority populations. As shown in **Figure 20-2** and **Table 20-1**, Census block groups within
116 the Local Study Area had a population of 18,101 in 2010. African Americans make up the largest
117 minority group in the Local Study Area, at approximately 16.3 percent.

118 Much of the Local Study Area is not occupied as housing, but instead by places of business, retail,
119 government, transportation, parks, or recreation. At the southern portion of the Local Study Area in
120 Arlington County, populated census blocks occur in the Crystal City and Pentagon City neighborhoods.
121 Of the six populated Census blocks in Virginia in the Local Study Area, minority populations range from
122 0 percent to 38 percent.

123 East Potomac Park, West Potomac Park, and the National Mall occupy large parts of the Census blocks in
124 the District within the Local Study Area. Two Census blocks north of the National Mall, approximately
125 0.5 miles from the railroad Corridor, consist of 100 percent minority (in this case, African American)
126 populations. Twelve occupied Census blocks exist in the southern portion of the Local Study Area in the
127 District (in the vicinity of the Southwest Waterfront). Of these 12, four include minority populations
128 exceeding 50 percent (ranging from 56 percent to 77 percent).

129 The analysis used the Council on Environmental Quality guidance threshold of 50 percent as an indicator
130 of minority populations within the Local Study Area. The analysis used this threshold because of the
131 wide variance in minority populations within the Local Study Area. Using the percent minority in the
132 District as a threshold may underrepresent minority populations, while using the percent minority in
133 Arlington County may overrepresent minority populations for the purposes of the EJ analysis.

134 For Census blocks where the minority population was below the threshold (as indicated by data from
135 the Year 2010 Census), the analysis used the presence of places of worship with predominantly minority
136 congregations to determine whether localized EJ communities exist. While two places of worship exist
137 within the Local Study Area, neither appear to host predominantly minority congregations.

138 **Figure 20-2 |** Minority Population in the Local Study Area



139

Note: Numbers denote block groups. See Tables 20-1 and 20-2 for more details on specific block groups.

140 **Table 20-1** | Minority Populations in Local Study Area

Map Number	Geography	Minority Percentage	Total Population
1	Block 5008, Block Group 5, Census Tract 1034.02	0.0%	1
2	Block 5009, Block Group 5, Census Tract 1034.02	22.3%	892
3	Block 4000, Block Group 4, Census Tract 1034.02	25.0%	737
4	Block 2000, Block Group 2, Census Tract 1034.02	17.2%	261
5	Block 2001, Block Group 2, Census Tract 1034.02	25.4%	849
6	Block 1008, Block Group 1, Census Tract 1034.02	30.2%	530
7	Block 1006, Block Group 1, Census Tract 1034.02	28.9%	90
8	Block 1000, Block Group 1, Census Tract 1034.02	17.3%	323
9	Block 1001, Block Group 1, Census Tract 1035.03	37.9%	499
10	Block 1003, Block Group 1, Census Tract 1035.03	27.4%	1586
11	Block 2000, Block Group 2, Census Tract 1035.03	32.0%	125
12	Block 2001, Block Group 2, Census Tract 1036.02	19.7%	575
13	Block 1001, Block Group 1, Census Tract 1036.02	25.1%	634
14	Block 2001, Block Group 2, Census Tract 1035.03	29.0%	1899
15	Block 2000, Block Group 2, Census Tract 1035.02	39.4%	1020
16	Block 1004, Block Group 1, Census Tract 1035.02	29.5%	556
17	Block 1000, Block Group 1, Census Tract 1035.02	16.1%	87
18	Block 2034, Block Group 2, Census Tract 102	9.4%	64
19	Block 2038, Block Group 2, Census Tract 102	59.0%	607
20	Block 1021, Block Group 1, Census Tract 102	50.0%	440
21	Block 1018, Block Group 1, Census Tract 102	55.7%	131
22	Block 2028, Block Group 2, Census Tract 105	42.8%	1005
23	Block 2027, Block Group 2, Census Tract 105	76.8%	436
24	Block 1016, Block Group 1, Census Tract 102	43.3%	90
25	Block 1019, Block Group 1, Census Tract 102	56.5%	177
26	Block 1020, Block Group 1, Census Tract 102	41.6%	89
27	Block 2040, Block Group 2, Census Tract 102	35.0%	157
28	Block 2023, Block Group 2, Census Tract 102	29.3%	41
29	Block 1009, Block Group 1, Census Tract 102	10.0%	20
30	Block 1022, Block Group 1, Census Tract 62.02	100.0%	3
31	Block 1021, Block Group 1, Census Tract 62.02	100.0%	8

141 Based on this analysis, the Local Study Area contains several small distinct EJ communities
 142 (**Figure 20-2**). All of these minority population communities are in the District. The majority of these
 143 communities do not live within the Census blocks immediately adjacent to the Long Bridge Corridor,
 144 although they may use park resources within the Local Study Area. Specifically, local District residents
 145 use East Potomac Park for activities such as cycling along Ohio Drive, walking on trails, and picnicking
 146 along the waterfront.

147 **20.3.2. Low-Income Populations**

148 Using the definition for a low-income person described in **Section 20.1, Introduction**, the analysis
 149 identified an area as containing a low-income population when the median household income for the
 150 area is below the HHS poverty threshold (\$24,250 for a family of four in 2015). Because the guidelines
 151 for nationwide and median incomes are higher in the District and Northern Virginia than nationally, the
 152 analysis also identified the percentage of households below 150 percent of the HHS poverty guidelines
 153 for each block group. Using this more conservative measure, the analysis identified approximately
 154 11 percent of the population in the Local Study Area as low income, with approximately 13 percent of
 155 households in Arlington County and approximately 26 percent of the households in the District
 156 qualifying as low income. Therefore, the analysis used a very conservative threshold of 13 percent to
 157 identify low-income populations in the Local Study Area for the EJ analysis. The analysis used this
 158 threshold because a block group with greater than 13 percent of its households below 150 percent of
 159 HHS poverty guidelines exceeds the proportion for Arlington County as a whole. Arlington County is the
 160 more affluent of the two jurisdictions that intersect the Local Study Area.

161 As shown in **Table 20-2** and **Figure 20-3**, the low-income population varies across the Local Study Area
 162 from a low of 0 percent to a high of approximately 24 percent. Two block groups in the Local Study Area
 163 (both in the District) have a percentage of low-income households higher than 13 percent.

164 **Table 20-2 | Low-Income Population in the Local Study Area**

Block Group	Below Poverty Line	Below 150% of Poverty Line
Block Group 1, Census Tract 62.02	0%	0%
Block Group 1, Census Tract 102	11%	16%
Block Group 2, Census Tract 102	6%	11%
Block Group 1, Census Tract 105	24%	35%
Block Group 2, Census Tract 105	9%	10%
Block Group 5, Census Tract 1034.02	4%	7%
Block Group 1, Census Tract 9801	0%	0%
Block Group 1, Census Tract 9802	0%	0%
<i>Note:</i>	<i>Entries in bold indicate block groups with low-income populations over 13%</i>	
<i>Source:</i>	<i>United States Census Bureau, 2011–2015 ACS 5-Year Estimates</i>	

165

166 **Figure 20-3** | Low-Income Populations and Affordable Housing in the Local Study Area



167

168 Additionally, the analysis used the presence of affordable housing to determine whether localized EJ
 169 communities exist (**Table 20-3**). **Figure 20-3** also shows the location of affordable housing units
 170 identified during initial data collection efforts (in 2018). As of that time, five affordable housing sites
 171 existed within the Local Study Area. All five of these sites are high-end private developments that
 172 reserve some units for residents meeting certain income limits, thus qualifying for affordable housing
 173 credits.

174 **Table 20-3 | Affordable Housing Units in the Local Study Area**

Label	Site Name	Address	Jurisdiction
1	Old Engine Co. 13*	400–598 School Street SW	Washington, DC
2	The Warf Phase I	1100 Maine Avenue SW	Washington, DC
3	Riverside Baptist Development	680 I (Eye) Street SW	Washington, DC
4	Lenox Club	401 12th Street S	Arlington, VA
5	Crystal City Lofts	305 10th Street S	Arlington, VA

*Under construction

175
 176 Additionally, the District’s Southwest Waterfront area is experiencing intensive redevelopment,
 177 including the construction of additional residential buildings. The District’s Inclusionary Zoning Program
 178 requires that new residential development projects of 10 or more units set aside 8 to 10 percent of the
 179 floor area for affordable rental or for-sale units. This program also requires the same set-aside for
 180 rehabilitation projects that are expanding an existing building by 50 percent or more and adding 10 or
 181 more units. Therefore, several other affordable units are likely to be available in the Southwest
 182 Waterfront area, in the vicinity of the Wharf and Riverside Baptist Development indicated in **Figure 20-3**.
 183 The availability of such housing in northern Arlington County and along the Southwest waterfront
 184 indicates the presence of EJ communities in these areas.

185 **20.4. Permanent or Long-Term Effects**

186 This section discusses the permanent or long-term effects following the construction of the No Action
 187 Alternative and Action Alternatives on EJ populations within the Local Study Area. For a complete
 188 description of the permanent or long-term effects, see **Appendix D3, Environmental Consequences**
 189 **Report**.

190 As noted in **Section 20.2.2, Methodology**, the EJ analysis reviewed all resource topics analyzed in this
 191 Environment Impact Statement (EIS) to identify resources with potential adverse effects. The screening
 192 for the potential for disproportionately high adverse effects on EJ populations involved the following
 193 steps:

- 194 • If the EIS identified no potential adverse effects, the analysis determined there was no potential
 195 for disproportionately high adverse effects on EJ populations.
- 196 • If the EIS identified adverse effects, the analysis reviewed the locations of the effects to
 197 determine if that area overlaps with the areas identified as areas of EJ concern.

- 198 ○ If no overlap would occur, the analysis determined there was no potential for
199 disproportionately high adverse effects on EJ populations.
- 200 ● If the analysis identified an overlap between adverse effects and areas of EJ concern, the effects
201 were further examined to determine if adverse effects would be concentrated upon EJ
202 populations or resources of importance to those populations.
- 203 ○ If the answer to this question was “No,” there was no need to further analyze the
204 potential for disproportionately high adverse effects on EJ populations. In these
205 cases, while adverse effects may take place in areas of EJ concern, they would be
206 felt by all populations living in or using the area, regardless of race, ethnicity, or
207 socioeconomic status.

208 This screening is described in more detail in **Section 17.0, Environmental Justice** in **Appendix D3,**
209 **Environmental Consequences Report**. For the majority of resource areas, there would be no overlap
210 between potential effects and areas of EJ concern. The sections below describe the analysis when
211 potential effects would overlap areas of EJ concern.

212 **20.4.1. No Action Alternative**

213 The No Action Alternative would not cause disproportionately high permanent adverse effects on EJ
214 populations because the Project would not be constructed. This section also considers the potential for
215 changes due to planned and funded transportation projects likely to be implemented by 2040, and
216 maintenance projects necessary to keep the existing bridge and corridor in service. These other
217 potential projects are not anticipated to cause disproportionately high permanent adverse effects on EJ
218 populations.

219 **20.4.2. Action Alternative A (Preferred Alternative)**

220 Action Alternative A would not result in disproportionately high permanent adverse impacts on EJ
221 populations. Action Alternative A would not deny EJ populations benefits from the Project. Minority or
222 low-income persons would not disproportionately bear the environmental impacts of Action Alternative
223 A. In addition, Action Alternative A would not disproportionately affect facilities or services of
224 importance to such persons. Completion of Action Alternative A would not displace any persons.

225 The only adverse effects that would overlap with a possible EJ population are the negligible direct
226 adverse impacts on the National Mall Historic District (discussed in **Chapter 15, Cultural Resources**).
227 These impacts take place adjacent to two Census blocks identified as 100 percent minority (Blocks 1021
228 and 1022 of Census Tract 62.02).⁶ The general population within the Local Study Area, regardless of
229 race, ethnicity, or socioeconomic status, would experience any impacts to the integrity of the National
230 Mall Historic District.

231 Action Alternative A would affect approximately 2.4 acres of East Potomac Park (discussed in **Chapter**
232 **16, Parks and Recreation**). As noted in **Section 20.3.1, Minority Populations**, local District residents
233 including EJ populations who live nearby use East Potomac Park for activities such as cycling along Ohio
234 Drive, walking on trails, and picnicking along the waterfront. However, the effects would not alter the

⁶ No housing exists in this area; therefore, the 11 total individuals counted in these two blocks may be homeless individuals.

235 recreational opportunities available to local residents because the majority of these activities take place
236 south of Buckeye Drive, away from the location of impacts to the park. Therefore, Action Alternative A
237 would not cause disproportionately high adverse effects on EJ populations, and no further analysis was
238 conducted.

239 **20.4.3. Action Alternative B**

240 The potential for impacts on EJ populations resulting from Action Alternative B would be the same as
241 Action Alternative A, with approximately 0.3 additional acres of East Potomac Park affected. Action
242 Alternative B would not result in disproportionately high permanent adverse impacts on EJ populations.
243 Action Alternative B would not deny EJ populations benefits from the Project. Minority or low-income
244 persons would not disproportionately bear the environmental impacts of Action Alternative B. In
245 addition, Action Alternative B would not disproportionately affect facilities or services of importance to
246 such persons. Completion of Action Alternative B would not displace any persons.

247 **20.5. Temporary Effects**

248 This section discusses the direct or indirect temporary effects of the No Action Alternative and Action
249 Alternatives during construction, based on conceptual engineering design. For the complete technical
250 analysis of the potential temporary impacts to EJ populations, see **Appendix D3, Environmental**
251 **Consequences Report.**

252 **20.5.1. No Action Alternative**

253 The No Action Alternative would not cause disproportionately high temporary adverse effects on EJ
254 populations because the Project would not be constructed. This section also considers the potential for
255 temporary impacts due to planned and funded transportation projects likely to be implemented by
256 2040, and maintenance projects necessary to keep the existing bridge and Corridor in service.
257 Anticipated effects include noise, vibration, dust, and traffic due to construction activity. Within the
258 Local Study Area, construction for these other potential projects would not occur proximate to EJ
259 populations and therefore are not anticipated to cause disproportionately high temporary adverse
260 effects on EJ populations.

261 **20.5.2. Action Alternative A (Preferred Alternative)**

262 Construction of Action Alternative A would not cause any disproportionately high temporary adverse
263 effects on EJ populations. Minority or low-income persons would not disproportionately bear the
264 environmental impacts of Action Alternative A. In addition, Action Alternative A would not
265 disproportionately affect facilities or services of importance to such persons. Construction of Action
266 Alternative A would not displace any persons. Construction activities for Action Alternative A would last
267 approximately 5 years. For most resources, any adverse impacts would not overlap with areas of EJ
268 concern. See the following paragraphs for additional discussion for the resources where adverse impacts
269 would overlap areas of EJ concern.

- 270 • **Transportation:** The cluster of four minority census blocks located in the vicinity of the
271 Southwest Waterfront may use some of the bus lines and roadways that construction on the I-
272 395 bridge would affect. However, all users regardless of race, ethnicity, or socioeconomic
273 status would experience impacts on transit service and traffic. Therefore, Action Alternative A

274 would not cause disproportionately high adverse effects on EJ populations, and no further
 275 analysis was conducted.

276 • **Air Quality:** Pollutant emissions during construction would occur from emissions from on-site
 277 diesel equipment, increased truck traffic to and from the construction site, and fugitive dust.
 278 These emissions are likely to be most concentrated adjacent to the railroad corridor and
 279 construction areas, which do not include areas of EJ concern. The general population within the
 280 Local Study Area regardless of race, ethnicity, or socioeconomic status would experience these
 281 temporary impacts. Therefore, Action Alternative A would not cause disproportionately high
 282 adverse effects on EJ populations, and no further analysis was conducted.

283 • **Noise:** Prior to mitigation, daytime construction noise levels would exceed the District noise
 284 ordinance at two receptors in East Potomac Park adjacent to the railroad corridor. As noted
 285 above, residents of nearby communities, including minority and low-income residents, use East
 286 Potomac Park for activities such as cycling along Ohio Drive, walking on trails, and picnicking
 287 along the waterfront. However, the bulk of these activities take place south of Buckeye Drive
 288 SW in areas that would not be adversely affected by construction noise. Noise impacts would
 289 generally be noticed by trail users on foot or on bicycle passing near the railroad corridor. All
 290 users regardless of race, ethnicity, or socioeconomic status would experience these impacts.
 291 Therefore, Action Alternative A would not cause disproportionately high adverse effects on EJ
 292 populations, and no further analysis was conducted.

293 • **Cultural Resources:** The negligible impacts from construction on the National Mall Historic
 294 District (discussed in **Chapter 15, Cultural Resources**) would overlap with a possible EJ
 295 population. These impacts take place adjacent to the same minority census blocks mentioned in
 296 **Section 20.4.2, Action Alternative A**. The general population within the Local Study Area,
 297 regardless of race, ethnicity, or socioeconomic status would experience any impacts to the
 298 integrity of the National Mall Historic District. Therefore, there are no disproportionately high
 299 adverse effects on EJ populations, and no further analysis was conducted.

300 • **Recreation and Parks:** Temporary impacts to East Potomac Park include use of NPS Parking Lots
 301 B and C and the ballfield along Ohio Drive SW near the National Mall and Memorial Parks
 302 (NAMA) Headquarters for construction staging. The surface parking areas are heavily used
 303 during events such as the National Cherry Blossom Festival, but lightly used most of the rest of
 304 the year. As noted above, the bulk of activities in East Potomac Park take place south of Buckeye
 305 Drive SW in areas that would not be adversely affected by construction. All users regardless of
 306 race, ethnicity, or socioeconomic status would experience the temporary impacts north of
 307 Buckeye Drive SW. Therefore, Action Alternative A would not cause disproportionately high
 308 adverse effects on EJ populations, and no further analysis was conducted.

309 **20.5.3. Action Alternative B**

310 Action Alternative B would have similar temporary impacts to those described under Action Alternative
 311 A. The only differences in the potential for impacts than those described above in **Section 20.5.2, Action**
 312 **Alternative A**, are:

- 313 • A small change in the precise locations of impacts, and
- 314 • The effects would last approximately 3 years longer than Action Alternative A.

315 For the same reasons described in **Section 20.5.2, Action Alternative A**, construction of Action
316 Alternative B would not cause any disproportionately high temporary adverse effects on EJ populations.
317 Action Alternative B would not result in disproportionately high temporary adverse impacts on EJ
318 populations. Minority or low-income persons would not disproportionately bear the environmental
319 impacts of Action Alternative B. In addition, Action Alternative B would not disproportionately affect
320 facilities or services of importance to such persons. Construction of Action Alternative B would not
321 displace any persons.

322 **20.6. Avoidance, Minimization, and Mitigation**

323 The Project would not cause disproportionately high adverse effects on EJ populations. Therefore, no
324 avoidance, minimization, nor mitigation measures are warranted beyond those already described for
325 other resources where direct and indirect effects on those resources are described (including **Chapter 9,**
326 **Transportation and Navigation; Chapter 10, Air Quality and Greenhouse Gases; and Chapter 12, Land**
327 **Use and Property**).

328 **20.7. Coordination with Environmental Justice Communities**

329 One of the guiding principles of EJ is ensuring full and fair access to meaningful involvement by minority
330 and low-income populations in project planning and development. Therefore, a robust, sustained, and
331 transparent engagement process is essential through the life of the Project.

332 The Federal Railroad Administration (FRA) and the District Department of Transportation (DDOT) have
333 provided and will continue to provide opportunities for public involvement prior to and throughout the
334 National Environmental Policy Act of 1969 (NEPA) process through the Project website, contact list,
335 public information meetings, and public comment periods. FRA and DDOT implemented an Agency and
336 Public Coordination Plan in accordance with the requirements of 23 USC 139.

337 The goals for public involvement in the Project are:

- 338 • To provide an opportunity and a mechanism for public participants to engage in the
339 development of the Environmental Impact Statement (EIS) and give relevant input to the
340 Project.
- 341 • To focus public input in a structured manner that will allow decisions to be made with the
342 maximum benefit from public involvement.
- 343 • To ensure that elected officials, agencies, stakeholders, and the general public are adequately
344 informed about the Project and its implications for their communities, and to identify potential
345 issues so that they can be addressed and resolved before the completion of the EIS process.

346 The following principles have been adopted to support involvement of local EJ communities in the Study
347 Area:

- 348 • Documents, notices, and meetings will be made concise, understandable, and readily accessible
349 to the public;
- 350 • Informational material will be made available through a variety of outlets;

- 351 • All public events will be scheduled at convenient and accessible locations and times;
- 352 • Title VI forms will be provided at meetings; and
- 353 • Various community leaders and groups will be contacted to increase public participation of
- 354 constituent communities.

355 The Project website, newspaper advertisements (*Washington Express*, *El Tiempo Latino*), press releases,
356 email blasts, local distribution of meeting flyers (nearby public facilities, community groups), and social
357 media (FRA and DDOT Facebook and Twitter) have been and will continue to be used to publicize all
358 public meetings. Advertisements have been and will continue to be published in Spanish, translation
359 services have been and will continue to be available to public meeting attendees, and American Sign
360 Language interpreters have been and will continue to be available at meetings. Meeting announcements
361 have included and will continue to include information on how to request special accommodations and
362 language assistance services (translation or interpretation).

363 DDOT is committed to providing all citizens, regardless of race, color, age, gender, or national origin, the
364 opportunity to participate in and respond to transportation plans, programs, and activities that may
365 affect their community. To help ensure DDOT reaches this goal and maintains compliance with Title VI of
366 the Civil Rights Act of 1964 and all relevant Federal and local nondiscrimination laws, DDOT asked
367 participants at each meeting to voluntarily complete a Title VI public involvement questionnaire. DDOT
368 initiated public outreach for the Project in 2012, prior to the initiation of the NEPA process, with the
369 Phase I Study and development of the Project website (www.longbridgeproject.com). The Phase I Study
370 included three public meetings conducted in an open-house format between November 2012 and
371 December 2013. DDOT announced meetings through advertisements in the *Washington Post*, postcards
372 distributed at Metro stations during morning commute hours, and email distributed to the Project
373 mailing list.

374 Following the initiation of the Phase II Study, FRA and DDOT held a public meeting on February 10, 2016,
375 to update the public on the Project status and schedule. DDOT and FRA announced this meeting through
376 an advertisement in the *Washington Post Express*, website notification, and email distribution to the
377 Project mailing list.

378 FRA and DDOT held a public scoping open house meeting on September 14, 2016. The Project website
379 provides materials presented at the meeting, including displays, a Fact Sheet, and the Draft Purpose and
380 Need. FRA and DDOT notified stakeholders, elected officials, and the public of the meeting through
381 issuance of the Notice of Intent and email notification. FRA and DDOT also mailed flyers to adjacent
382 property owners. FRA and DDOT published advertisements in the *Washington Post* and the *Washington*
383 *Post Express*.

384 Following Scoping, FRA and DDOT held three public meetings to provide information about the project
385 and solicit feedback at key milestones. FRA and DDOT held these meetings on May 16 and December 14,
386 2017, and on November 29, 2018. The Project website provides materials presented at the meetings,
387 including displays and the presentation. The Project website also provides summaries of the
388 December 14, 2017, and November 29, 2018, meetings. FRA and DDOT publicized each meeting by:

- 389 • Posting information on the Project website, www.longbridgeproject.com, beginning three weeks
- 390 prior to the meeting.

- 391 • Publishing advertisements in two newspapers—*Washington Post Express* (English) and
392 *El Tiempo Latino* (Spanish)—to inform both the English-speaking public and the Spanish-
393 speaking public of the meeting.
- 394 • Distributing an e-blast notification to the Project electronic mailing list three weeks prior to the
395 meeting, and a reminder notification three days prior to the meeting.
- 396 • Announcing the meeting through a DDOT-issued press release.
- 397 • Publicizing the meeting via social media, including the DDOT Twitter account and the FRA
398 Facebook account.

399 Following publication of the Draft EIS, FRA and DDOT will hold a public hearing. The public hearing will
400 include an opportunity for oral testimony, to be recorded by a stenographer. Comments and testimony
401 provided at the public hearing will be addressed in the Final Environmental Impact Statement. Spanish-
402 language translators will be available at the public hearing.