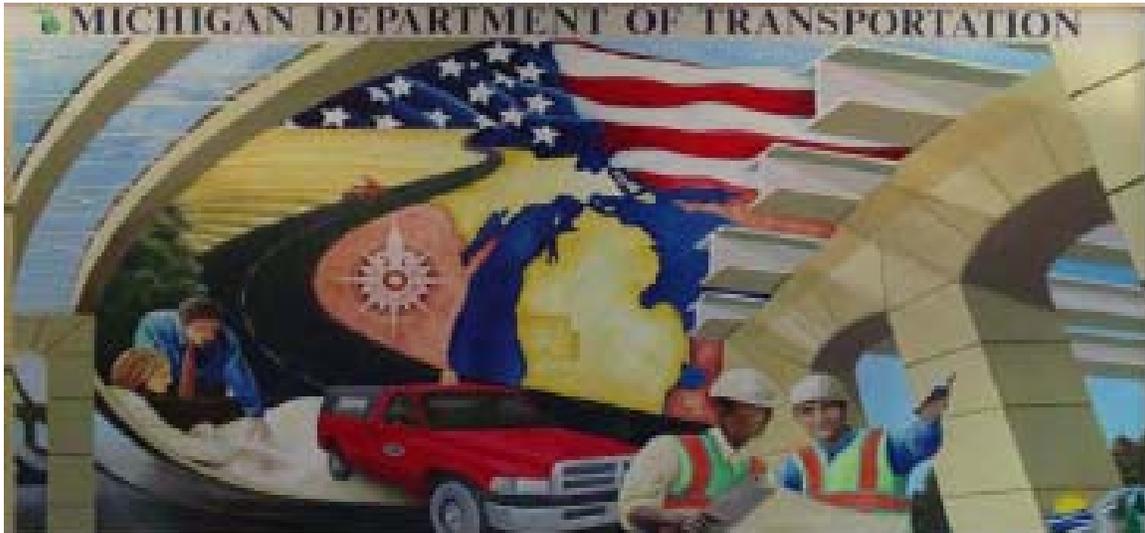


ENVIRONMENTAL JUSTICE ANALYSIS REPORT CALL FOR PROJECTS FY 2012-2016



June 2011

Table of Contents

Table of Contents	2
Environmental Justice Technical Report for Michigan Department of Transportation FY 2012 - 2016 Call for Projects	3
Introduction.....	3
Methodology.....	4
FY 2012 - 2016 CFP Analysis.....	6
Bay Region EJ Analysis.....	7
Metro Region EJ Analysis	10
North Region EJ Analysis.....	13
Southwest Region EJ Analysis	15
Superior Region EJ Analysis	18
Disadvantaged Business Enterprise (DBE)	20

**ENVIRONMENTAL JUSTICE TECHNICAL REPORT FOR
MICHIGAN DEPARTMENT OF TRANSPORTATION FY 2012 - 2016
CALL FOR PROJECTS**

Introduction

As a recipient of federal financial assistance in transportation planning activities, the Michigan Department of Transportation (MDOT) is required under Title VI Act of 1964, the National Environmental Policy Act of 1969, the Civil Rights Restoration Act of 1987, the Federal-Aid Highway Act of 1970 and the Environmental Justice (EJ) Executive Order 12898 of 1994 to identify disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. The department must not restrict an individual in any way or form from the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under its programs or projects. Individuals may not be subjected to criteria or methods of administration which cause adverse impact because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program because of race, color, or religion.

The intent of this technical report is to enunciate MDOT's Call for Projects (CFP) process and procedures and how such process and procedures informs a just and equitable process of project development and project selection decision making. This technical report is developed for internal reporting purposes only and all the analysis therein are relevant only to MDOT's CFP. The report strives to explain the processes and procedures behind MDOT project development and selection process and further ensure that the proposed list of projects as presented in the CFP candidate list are developed in accordance with the law such that:

- There is full compliance with the Title VI Civil Rights Act of 1964 and the EJ Executive Order 12898 of 1994 and all other related regulations and directives therein.
- The process used in developing the candidate projects ensures that people affected by MDOT's programs and projects receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin, age, sex, or disability.
- The process ensures and prevents any form of discrimination in MDOT programs and activities, whether those programs and activities are federally funded or not.

- The process establishes procedures for identifying impacts in any program, service, or activity that may create an illegal adverse impact on any person because of race, color, or national origin, sex, disability; or on minority populations and low-income populations basis.

Methodology

Impacts to EJ groups should be considered during project and program development. To ensure that MDOT's overall program established a fair process and does not disproportionately distribute benefits or negative effects on minority and low-income populations, the following methodology is used in the evaluation process.

1. Acquiring the most current population census data from the U.S. Census Bureau and adopting the U.S. Department of Human Services Poverty Standards as publicized by the department.
2. Computing the statewide average and establishing a statewide baseline threshold.
3. Synthesizing the census data with the Location Quotient statistical method to calculate and compare the share contribution of an areas' local economy to another referenced economy, in this case, Block Group level to State level¹.
4. Request a developed snapshot query of all MDOT trunkline projects, currently programmed by **START DATE** in MAP Project Information System (MPINS) and as recently approved by the MDOT CFP Screening Committee
5. Develop sets of statewide thematic maps showing the spatial location of low-income populations and minority populations² at statewide level and statistically analyzing at MDOT-designated region level.
6. Develop a project level map showing all the list of candidate projects at the statewide level details and statistically analyzing at MDOT-designated region level.

¹ Location Quotient (LQ) is a slightly sophisticated statistical technique used in calculating and comparing the share contribution of an area's local economy to another referenced economy. The LQ statistical method strives to show if a local economy has a greater share than expected of a given economy, that extra contribution marks the additional contribution that such local economy is contributing. In this scenario, the LQ method is used to determine whether or not a particular block group in Michigan has a greater share of its racial groupings than expected in the state. Hence, that local economy having a greater than one contribution will be recognized as EJ zones in the state. $LQ < 1.0$ Places with LQ greater than one provides evidence that such racial groups have such racial populations greater than their expected EJ populations, these block group would represent the selection set considered as EJ zones.

² Minority means a person who is: (1) Black (a person having origins in any of the black racial groups of Africa); (2) Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race); (3) Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands); or (4) American Indian and Alaskan Native (a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition).

7. Overlaying the thematic maps of candidate project list over the low-income and minority population maps and analyzing for intersections on the basis that a project is included or is partially tangential to an EJ area.
8. At the region level, evaluating for cost relationship and any negative or disproportionate effect and/or positive outcomes of transportation projects on EJ populations.
9. Collecting contract information from the MDOT Contract Services Division and evaluating what share of the total contract benefits Disadvantaged Business Enterprises (DBE) and how that tracks over time.

PROJECT DEVELOPMENT & PROJECT SELECTION TOOLS

Title VI and EJ Executive Order 12898 are two federal requirements requiring state grantors to justify that the process behind the agency's project management operations has a fair but also a just procedure. In addition, the process must look out for those classified population considered as low-income, minority populations and Title VI groups. The MDOT project development and selection process has its basis rooted in the following three fundamental principles:

- Providing adequate opportunity, plans and processes for public involvement for low-income, minority populations and Title VI groups in regional transportation planning decision-making process.
- Devoting human and technical resources towards the fair assessment and monitoring of any disproportionately high and adverse impacts of transportation projects on low-income, minority populations and Title VI groups resulting from federal grants.
- Ensuring and assuring that low-income and minority populations and Title VI groups receive a proportionate share of benefits from federal transportation investments.

MDOT's project development and selection process follows a meticulous data-intensive reviewing and analyzing procedure that cumulates into the annual MDOT CFP's process and plan development. MDOT's CFP is an internal document that source policy directions from the federally required State Long Range Plan (SLRP) and both documents are mutually consistent policy and project implementation direction. The SLRP is a 25-year federally required horizon plan specifying MDOT's broad goals; objectives and direction towards providing the highest quality of integrated transportation services for economic benefit and improved quality of life in Michigan. The SLRP provides the policy guidelines, implementation strategies and measures of efficiencies necessary for a plan development. The CFP is a strategic process leading from identification of needs, project development stages and the final selection of candidate project that rolls up into the MDOT Five-Year Transportation Program³.

³ The Five-Year Transportation Program is MDOT's official document house the department's transportation improvement plan and projects for a five-year period. This document is annually updated and annually approved by the State Transportation Commission. It is the equivalent of the Metropolitan Planning Organizations Transportation Improvement Program (TIP).

Helping to achieve these policy directions and guiding the informed decision-making process for the need identification is a set of underlying database instruments called the Transportation Management System (TMS). The TMS is designed and implemented by MDOT to serve as an integral decision support tool to feed a comprehensive project prioritization process and to provide a clear link showing how proposed projects and proposed use of funds support the State Long Range Plan and the Long Range Plans of TMAs, MPOs and other agencies within Michigan.

The TMS is designed as a single management system with six components or subsystems. These systems include the Bridge Management Systems, Congestion Management Systems, Intermodal Management Systems, Pavement Management Systems, Safety Management Systems and the Public Transportation Management Systems.

FY 2012 - 2016 CFP ANALYSIS

This analysis presents the outcome of the EJ evaluations by region in only five of the seven MDOT regions. The other regions chose to have staff in the regional offices produce this report. For the purpose of this analysis, and for the first time, types of projects analyzed in the FY 2012 - 2016 CFP are divided into two broad categories, Categorical Exclusion (CE) projects and EJ-significant projects.

CE projects are defined as those projects that do not individually or cumulatively have significant effect on the human environment, and which, therefore, neither an environmental assessment nor an environmental impact statement is required. Primary work-type definition of such projects include road resurfacing, restoration and rehabilitation, bridge or deck replacement, capital preventive maintenance, traffic operations/safety, and other such projects covered under the FHWA-certified CE checklist of projects (see <http://www.dot.ca.gov/ser/downloads/ce/CE-CEChecklist.doc>).

EJ-significant projects are defined as projects that may individually or cumulatively have significant effects on the human health or social environment and for which environmental assessment and/or environmental impact statements are required. Primary work-type definition of such project includes new road or new route capacity improvements, minor and major capacity improvements and such projects that may include property condemnation or acquisitions and/or takings, or the acquisition of major right of way.

BAY REGION EJ ANALYSIS

The Bay Region FY 2012 - 2016 CFP proposes projects ranging from primary work-types like reconstruction, roadside facility improvements, resurfacing, traffic operations/safety, minor and major widening and restore and rehabilitate projects. All projects proposed in this CFP are expected to improve economic development and the delivery of goods and services in the region. This "mix of fixes" approach should maximize the greatest productivity from available transportation funding dollars. The list of projects pulled from the MPINS database and considered here, as the snapshot query, generated a total of 189 projects for the FY 2012 - 2016 CFP for the Bay Region area. The spatial overlay analysis of these different types of projects over low-income and minority-identified population areas show that 26 of the 43 projects proposed in FY 2012; 19 of 30 projects in FY 2013; 15 of the 22 projects in FY 2014; 15 of the 25 projects in FY 2015; and 4 of the 8 proposed projects in 2016 have spatial connectivity (either tangentially touching or passing through) and economic benefits to block groups classified by U.S Census Bureau 2000 data as locations of people of low income, or minority populations or classified as Title VI population (see Table 1 and 2 and Bay Region map).

Table 1: Aggregate Number of Projects and Costs in Bay Region

Table 1: Aggregate Number of Projects and Costs in Bay Region					
	Projects in EJ Zones	Total No. of Projects	% EJ Zones	Cost of EJ Projects	Total Cost
FY 2012	26	43	60.5%	\$100,907,606	\$118,000,621
FY 2013	19	30	63.3%	\$96,228,335	\$100,076,664
FY 2014	15	22	68.2%	\$57,435,503	\$61,194,865
FY 2015	14	25	56.0%	\$103,876,545	\$115,260,373
FY 2016	4	8	50.0%	\$9,428,513	\$9,818,513
Total	78	128		\$367,876,502	\$404,351,036

Source: MDOT MPINS Snapshot Query, 2011

Transportation planning dollars to be invested in these communities in FY 2012 - 2016 are estimated to be approximately \$367 million. The breakdown of the economic benefit for FY 2012 is estimated at about \$100.9 million; \$96.2 million in FY 2013; \$57.4 in FY 2014; \$103.8 million in FY 2015 and \$9.4 million in the outer year or FY 2016.

The following minor and major widening lists of projects are identified as likely EJ-significant projects that will be implemented in the Bay Region in the coming years. It has been determined that no adverse impacts are associated with the proposed system improvements, impacts of foot print of the project do not reach disproportionately high and adverse standard within identified EJ areas.

Table 2: Projects of EJ-Significance in the Bay Region

Table 2: Projects of EJ-Significance in the Bay Region						
Year	Region	Route	Location	Primary Work	EJ Sign.	Total Cost
2012	Bay	I-75	Dixie Highway to Hess	Widen - major (capacity increase)	American Indian, Black, Hispanics, Low-income	\$ 44,698,000
2013	Bay	I-75	Hess Road to North of I-675 Off Ramp	Widen - major (capacity increase)	American Indian, Black, Hispanics, Low-income	\$ 43,230,000
2014	Bay	I-75	Dixie Highway to Hess	Widen - major (capacity increase)	American Indian, Black, Hispanics, Low-income	\$ 44,698,000
2012	Bay	M-46	EB & WB M-46 in Saginaw County	Widen - minor		\$ 1,100,000
2013	Bay	M-46	Townline Road to Walmart	Widen - minor	Hispanics, Low-income	\$ 1,036,532
2015	Bay	M-46	EB & WB M-46 in Saginaw County	Widen - minor		\$ 1,100,000

Source: MDOT MPINS Snapshot query, 2011

METRO REGION EJ ANALYSIS

The Metro Region is comprised of the four counties of Wayne, Oakland, Monroe and St. Clair counties and has the largest program in the state. The FY 2012-2016 CFP proposes projects ranging from primary work-types like reconstruction, roadside facility improvements, resurfacing, traffic operations/safety, minor and major widening, restoration and rehabilitation projects and new road construction. All projects proposed in the region's CFP are expected to improve the life of its residents and encourage appreciable economic development opportunities for its residents, which includes the delivery of goods and services in the region. The Metro Region plan uses the "mix of fixes" approach in maximizing the greatest productivity for the available transportation funding dollars in the region. The list of projects generated from the MPINS database considered here as the snapshot query, generated a total of 218 projects for the FY 2012 - 2016 CFP for the Metro Region. The spatial overlay analysis of these different types of projects over low-income and minority-identified population areas show that 70 of the 83 projects proposed in FY 2012; 53 of 70 projects in FY 2013; 20 of the 28 projects in FY 2014; 21 of the 26 projects in FY 2015; and 5 of the 11 proposed projects in FY 2016 have spatial connectivity and economic benefits to block groups classified by U.S Census Bureau 2000 data as locations of people of low income or minority populations or classified as Title VI populations (see Table 3 and 4, and the Metro Region map).

Table 3: Aggregate Number of Projects and Costs in Metro Region

Aggregate Number of Projects and Costs in Metro Region					
	Projects in EJ Zones	Total No. of Projects	% in EJ Zones	Cost to EJ Zones	Total Cost
FY 2012	70	83	84.3%	\$320,003,126	\$361,740,329
FY 2013	53	70	75.7%	\$405,542,127	\$479,464,475
FY 2014	20	28	71.4%	\$104,092,049	\$125,935,009
FY 2015	21	26	80.8%	\$2,187,831,757	\$2,198,898,869
FY 2016	5	11	45.5%	\$53,870,000	\$247,044,938
TOTAL	169	218	77.5%	\$3,071,339,059	\$3,413,083,620

Source: MDOT MPINS Snapshot Query, 2011

Investments in transportation planning dollars in the Metro Region for FY 2012 will bring in over \$320 million to the region's EJ areas. According to the proposed work in the region for FY 2013, the region will invest about \$405.5 million in EJ areas; \$104 million in FY 2014; \$2.1 billion in FY 2015; and about \$53 million in a few of the already identified projects for FY 2016. The plan will invest a total of \$3.4 billion into the region in life of the CFP and approximately \$3 billion will add benefits to the life and works of low-income and minority populations in the area.

The following major projects have been considered EJ-significant projects in the Metro Region if implemented in the coming years. The New International Trade

Crossing Bridge (NITC) in Wayne County, the I-75 project in Oakland County and the M-25 project in St. Clair County. These are multi-phase projects that will generate jobs and economic development impact necessary for spurring economic growth and prosperity into EJ and low-income areas.

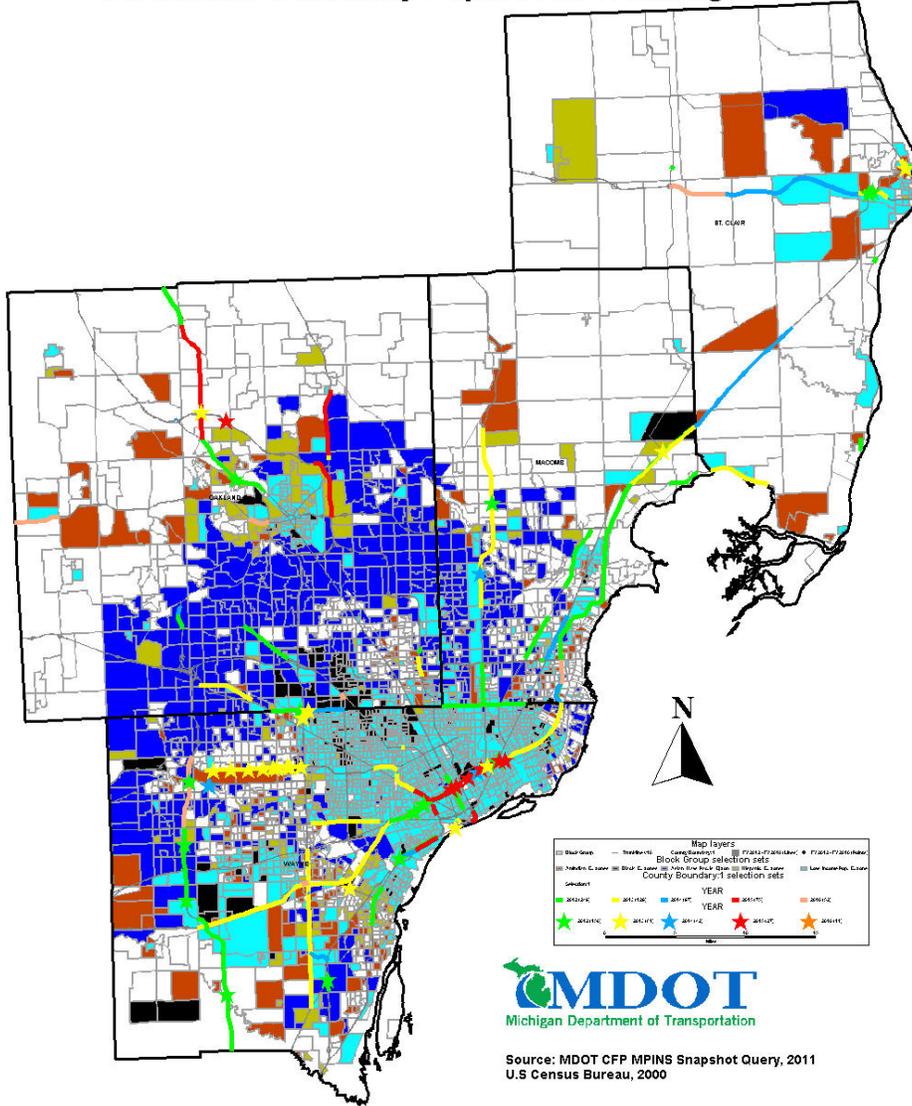
Table 4: Projects of EJ-Significance in the Metro Region

Projects of EJ Significance in the Metro Region						
Year	Region	Route	Location	Primary Work	EJ Sign.	Total Cost
2012	Metro	NITC	at I-75 Interchange, Plaza and Bridge	New route/structure	American Indian, Black,	\$ 50,000,007
2012	Metro	NITC	at NITC Plaza	New route/structure	American Indian, Black,	\$ 50,000,007
2012	Metro	NITC	at the NITC / I-75 Interchange	New route/structure	American Indian, Black,	\$ 50,000,007
2013	Metro	M-25/Pine	M-25/Pine Grove Avenue	New route/structure	American Indian,	\$ 420,049,924
2015	Metro	I-75	North Perimeter Road Interchange	Widen - major (capacity)	American Indian, Asian,	\$ 110,762,807
2012	Metro	M-29	at Michigan Road, city of Marysville	Widen - minor		\$ 560,000
Source: MDOT MPINS Snapshot Query, 2011						

The Economic Impact Study (EIS) for these projects has been submitted to FHWA for concurrency and approval. The projects have mitigation plans for all likely adverse impacts that may be associated with the proposed system improvements. Any other impact identified during implementation will be mitigated appropriately by following federal guidelines and regulations. This analysis shows that the footprint of the project does not have a disproportionately high and adverse impact on low-income and minority populations or classified as Title VI population living within identified EJ areas.

Map 2: Metro Region CFP Map

**Environmental Justice Analysis Showing
Metro Region Call for Projects FY 2012-2016 in
Low Income & Minority Pop. Areas of Michigan**



NORTH REGION EJ ANALYSIS

The North Region FY 2012 - 2016 CFP is proposing a total of 93 projects, 87 of which will fall in EJ designated areas. The primary work-types of projects in the region include repair and rehabilitation, reconstruction, roadside facility improvements, resurfacing, traffic operations/safety, and minor and major widening projects. All projects proposed in this CFP are expected to add economic growth and improve the delivery of goods and services in the North Region. With the program approach adopted by the region, the combination of projects proposed will maximize the use of available transportation funding dollars. The list of projects queried from the MPINS database used for this analysis shows a total of 93 projects have been programmed for the North Region and 80 of them will benefit EJ areas in the region. The spatial overlay analysis show that 34 of the 35 projects proposed in FY 2012; 16 of 22 projects in FY 2013; 13 of the 14 projects in FY 2014; 6 of the 9 projects in FY 2015; and 11 of the 13 proposed projects in FY 2016 has spatial connectivity and economic benefits to block groups classified as low-income or minority populations areas of Michigan (see Table 5 and 6 and North Region map).

Table 5: Aggregate Number of Projects and Costs in North Region

Aggregate Number of Projects and Costs in North Region					
	Projects in EJ Zones	Total No. of Projects	% in EJ Zones	Total Cost in EJ Zones	Total Cost
FY 2012	34	35	97.1%	\$50,451,866	\$55,678,765
FY 2013	16	22	72.7%	\$21,651,076	\$26,677,343
FY 2014	13	14	92.9%	\$25,447,356	\$27,072,356
FY 2015	6	9	66.7%	\$28,391,674	\$39,671,074
FY 2016	11	13	84.6%	\$29,225,875	\$33,225,875
Total	80	93	86.0%	\$155,167,847	\$182,325,413

Source: MDOT MPINS Snapshot Query, 2011

Transportation planning dollars expected to be invested in these EJ and low-income communities in FY 2012 to 2016 are estimated at approximately \$155.1 million total. The breakdown of the economic benefit for FY 2012 is estimated at about \$50.4 million; \$21.6 million in FY 2013; \$25.4 million in FY 2014; \$28.3 million in FY 2015 and \$29.2 million in the outer year of FY 2016.

The following minor and major widening lists of projects are identified as likely EJ-significant projects that will be implemented in the North Region in the coming years. It has been determined that no adverse impacts are associated with the proposed system improvements, and should any impact(s) be identified during the implementation phase, such impact will be appropriately mitigated in accordance with federal guidelines and regulations. The proposed projects in the

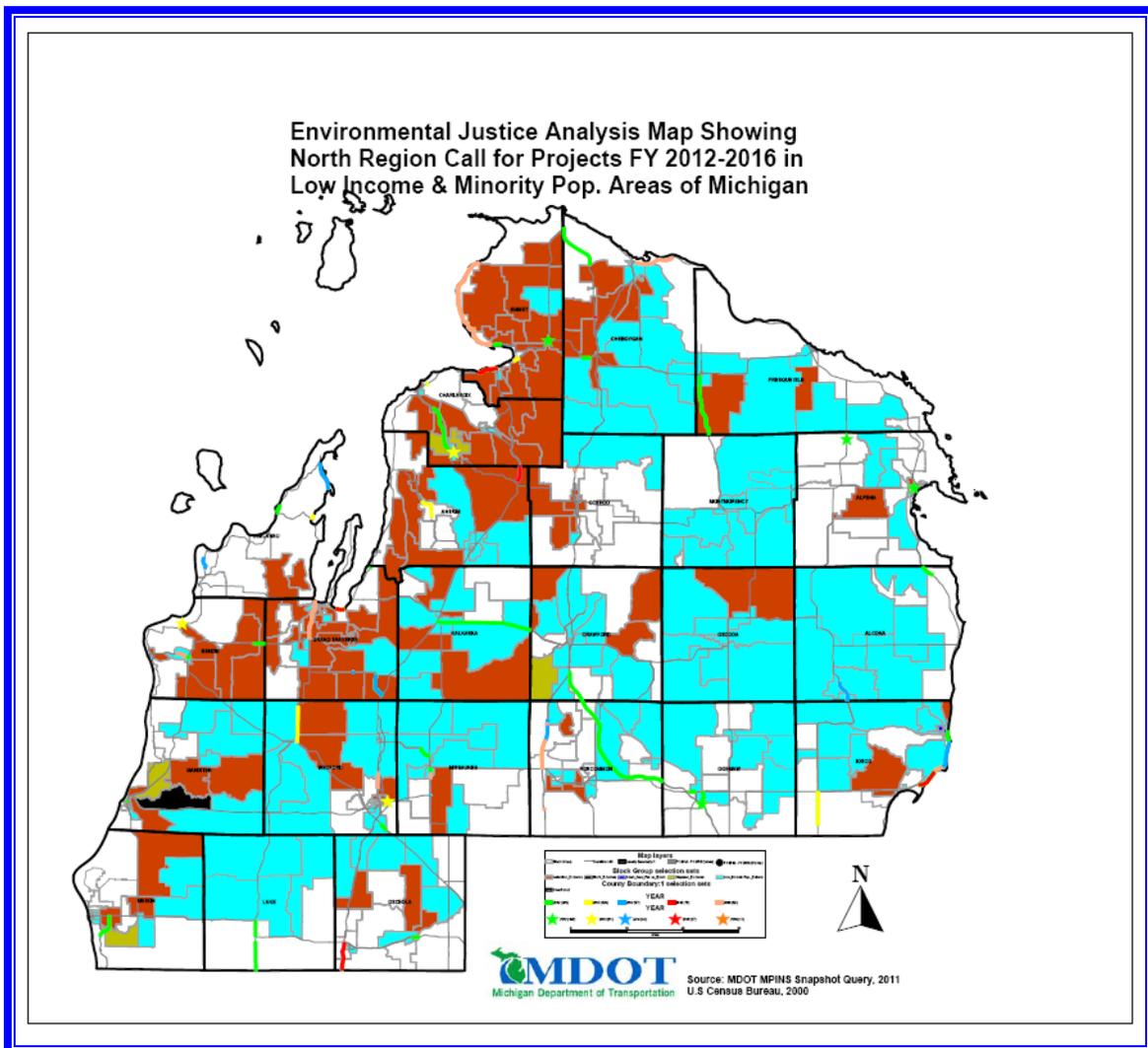
North Region CFP projects do not reach disproportionately high and adverse standard within the identified EJ areas.

Table 6: Proposed EJ-Significant Projects in the North Region

Table 6 Proposed EJ-Significant Projects in the North Region								
YEAR	REGION	COUNTY	JOB ID	ROUTE	LOCATION	PRIMARY WORK TYPE	Label	TOTAL COST
2012	North	OGEMAW	109229	M-55/I-75 BL	Husted to Gray Road	(capacity increase)	Asian, Low-income	\$ 1,597,449
2013	North	EMMET	113598	US-31	Townsend to Eppler	(capacity increase)	Indian, Lowincome	\$ 3,521,946
2015	North	EMMET	113598	US-31	Townsend to Eppler	(capacity increase)	Indian, Low-income	\$ 3,521,946

Source: MDOT MPINS Snapshot Query, 2011

Map 3: North Region CFP Map



SOUTHWEST REGION EJ ANALYSIS

Southwest Region FY 2012 - 2016 CFP proposed projects include reconstruction work, roadside facility improvements, resurfacing, traffic operations/safety, minor and major widening and restoration and rehabilitation projects. All projects proposed will have positive economic development impact and are expected to improve the delivery of goods and services in the region. The list of projects developed through the snapshot query from the MPINS database shows a total of 143 projects programmed for the region in FY 2012 - 2016. The spatial overlay analysis of these different types of projects over low-income and minority-identified population areas show that 63 of the 79 projects proposed in FY 2012; 25 of 34 projects in FY 2013; 11 of the 55 projects in FY 2014; 6 of the 9 projects in FY 2015 and 3 of the 6 proposed projects in FY 2016 has spatial proximity and economic benefit impact on block groups classified as locations of people of low income or minority populations or classified as Title VI population (see Table 7 and 8, and the North Region map).

Table 7: Aggregate Number of Projects and Costs in Southwest Region

Aggregate Number of Projects and Costs in Southwest Region					
	Projects in EJ Zones	Total No. of Projects	% No. of EJ Projects	Total Cost in EJ Zones	Total Cost
FY 2012	63	79	79.75%	\$125,355,576	\$152,202,583
FY 2013	25	34	73.53%	\$62,582,131	\$64,737,984
FY 2014	11	15	73.33%	\$66,576,526	\$61,479,512
FY 2015	6	9	66.67%	\$7,136,940	\$32,651,541
FY 2016	3	6	50.00%	\$20,224,025	\$16,273,364
	108	143	75.52%	\$281,875,198	\$327,344,984

Source: MDOT MPINS Snapshot Query, 2011

Transportation planning dollars expected to be invested in these communities in FY 2012 - 2016 is estimated at approximately \$327.3 million, with \$281.8 million benefiting people of low-income and minority populations. The breakdown of the economic benefit for FY 2012 is estimated at about \$125.3 million; \$62.5 million in FY 2013; \$66.5 in FY 2014; \$7.1 million in FY 2015 and \$20.2 million in the outer year or FY 2016.

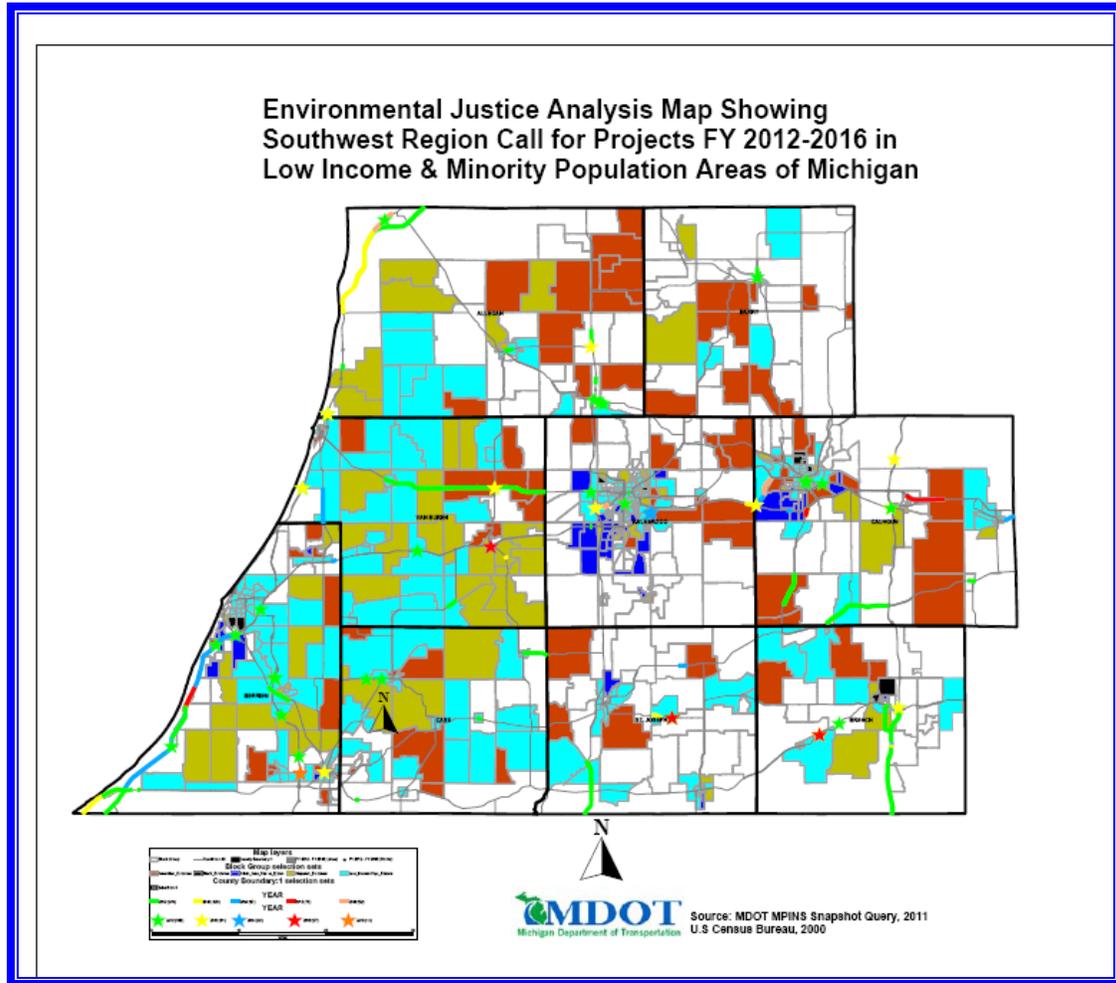
The following minor and new route lists of projects are identified as likely EJ-significant projects that will be implemented in the Southwest Region in the coming years. The US-131 new-route project is the most significant project in this list. It has been determined that no adverse impacts are associated with the proposed system improvements, and should any impact(s) be identified during the implementation phase, such impact(s) will be appropriately mitigated in accordance with federal guidelines and regulations. The proposed projects in the Southwest Region CFP projects do not reach disproportionately high and adverse impact standard on low income, Title Vi groups and minority populations living within the identified EJ areas

Table 8: Proposed EJ-Significant Projects in the Southwest Region

Projects of EJ-Significance in the Southwest Region						
YEAR	REGION	ROUTE	LOCATION	PRIMARY WORK TYPE	EJ Sign.	TOTAL
2012	Southwest	US-131	St. Joseph County	New route/structure (capacity)	American Indian, Low-income	\$23,829,999
2012	Southwest	US-12	1.5 miles east of I-94	Widen - minor		\$228,800
2012	Southwest	US-12	Gumwood Road	Widen - minor		\$743,000
2013	Southwest	M-86	Nottawa Street to Shimmel Road	Widen - minor	American Indian, Low-income	\$468,791
2013	Southwest	M-40	M-40 at 64th Avenue and 31st Street	Widen - minor	Hispanics	\$655,800

Source: MDOT MPINS Snapshot Query, 2011

Map 3: North Region CFP Map



SUPERIOR REGION EJ ANALYSIS

Over the duration of FY 2012 - 2016 CFP, the Superior Region program proposed a total of 122 projects, which include reconstruction work, roadside facility improvements, resurfacing, traffic operations/safety, minor and major widening and restoration and rehabilitation projects. About 83 (68 percent) of the projects have been identified to be located in low-income, minorities or Title VI block group areas. All projects proposed will have positive economic development impact and are expected to improve the delivery of goods and services in the region. The list of projects developed through the snapshot query from the MPINS database shows that 37 of the 56 projects proposed in FY 2012; 10 of 18 projects in FY 2013; 9 of the 17 projects in FY 2014; 20 of the 24 projects in FY 2015; and 7 of the 7 proposed projects in FY 2016 has spatial proximity and economic benefit impact on block groups classified as locations of people of low-income or minority populations or classified as Title VI population (see Table 9 and 10, and Superior Region map). The spatial overlay analysis of these different types of projects over low income and minority identified population areas is shown on Map 4 below.

Table 9: Aggregate Number of Projects and Costs in Superior Region

Aggregate Number of Projects and Costs in Southwest Region					
	Total Project in EJ Zones	Total Projects	% Projects in EJ Zones	Total Cost of Project in EJ Zones	Total Cost
FY 2012	37	56	66.1%	\$40,717,521	\$51,318,888
FY 2013	10	18	55.6%	\$15,379,853	\$18,517,177
FY 2014	9	17	52.9%	\$10,370,804	\$20,167,807
FY 2015	20	24	83.3%	\$28,085,144	\$29,877,673
FY 2016	7	7	100.0%	\$11,222,053	\$11,222,053
	83	122		\$105,775,375	\$131,103,598

Source: MDOT MPINS Snapshot Query, 2011

Transportation planning dollars expected to be invested in these communities in FY 2012 - 2016 are estimated at approximately \$131.1 million, with \$105.7 million benefiting people of low-income and minority populations. The breakdown of the economic benefit for FY 2012 is estimated at about \$40.7 million; \$18.5 million in FY 2013; \$10.3 in FY 2014; \$28 million in FY 2015 and \$11.2 million in the outer year or FY 2016.

The following three new route-listed projects are identified as likely EJ-significant projects to be implemented in the Superior Region in the coming years: the capacity-increase projects on M-26 in Houghton County, the M-28 project adjacent to Luce County Airport, and the M-28 project west of I-75 in the Dafter area. These projects are considered the most significant projects in this list. It has been determined that no adverse impacts are associated with the proposed system improvements, and should any impact(s) be identified during the implementation phase, such impact(s) will be appropriately mitigated in

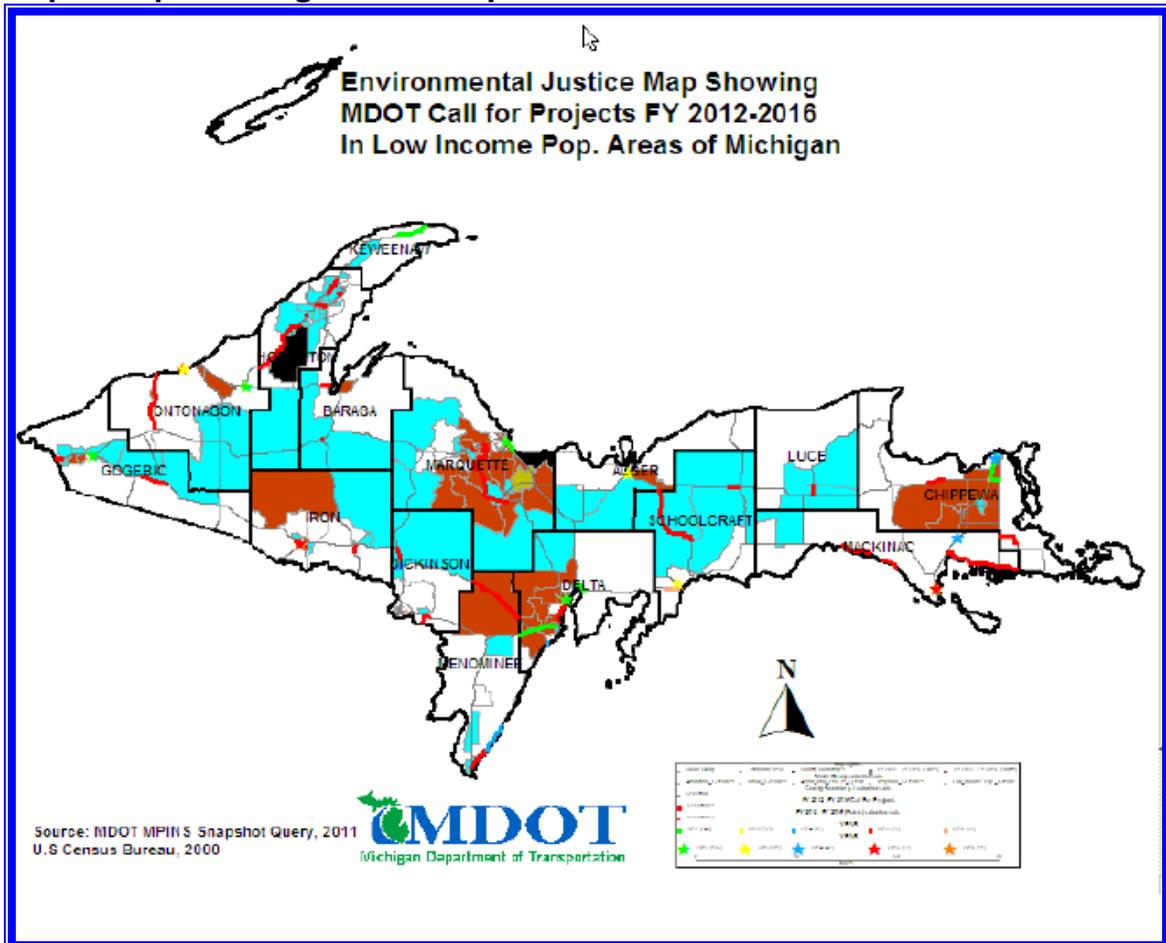
accordance with federal guidelines and regulations. The proposed projects in the Superior Region CFP projects do not reach disproportionately high and adverse impact standard on low-income, Title VI groups and minority populations living within the identified EJ areas

Table 9: Proposed EJ-Significant Projects in the Superior Region

Projects of EJ Significance in the Superior Region						
YEAR	REGION	ROUTE	LOCATION	PRIMARY WORK TYPE	EJ Sign.	TOTAL
2012	Superior	M-26	M-26, Houghton County	New route/structure (capacity increase)	Low Income	\$729,300
2014	Superior	M-28	Adjacent to Luce Co Airport	New route/structure (capacity increase)	American Indian Low Income	\$102,095
2016	Superior	M-28	west of I-75 at Dafter TST	New route/structure (capacity increase)	American Indian	\$99,665

Source: MDOT MPINS Snapshot Query, 2011

Map 4: Superior Region CFP Map



DISADVANTAGED BUSINESS ENTERPRISE (DBE)

All MDOT-assisted construction projects, consulting services, procurement services, contract administration services, and/or subcontracting administration services continue to be consistent with the provision of the law as stated in 49 CFR § 26.1⁴, and as directed and supported by the goals and objectives set by the State Transportation Commission. MDOT vendor selection processes, contracting, or subcontracting procedures follow strict federal regulations and reporting requirements that are monitored by quantifiable goals and objectives. According to the FY 2010 report by MDOT Contract Services Section, 496 prime contracts and subcontracts were awarded in FY 2010.

Table 9: Uniform Report of DBE Commitments/Awards and Payments, 2010

Uniform Report of DBE Commitments/Awards and Payments, 2010				
	Total Dollars (\$)	Total Number	Total to DBEs (\$)	Total to DBEs (numbers)
Prime Contracts Awarded this Period	\$ 57,444,124.22	496	\$ 2,538,992.07	26
Subcontracts Committed/ Awarded this Period	\$ 12,894,720.80	344	\$ 8,179,437.13	169
Totals	\$ 70,338,845.02		\$ 10,718,429.20	

Source: MDOT Contract Services Section, 2011

About 26 (5.24 percent) prime contracts and 169 (49.1percent) subcontracts benefited DBEs in Michigan during the time period. The breakdown of prime and subcontract opportunities accruing to minority groups through the DBE program totaled 195 contractual opportunities, at a tune of about \$10.7 million enterprise investments. In FY 2010, the African American population benefited from 18 prime or subcontracts totaling about \$916,531. About \$1.3 million from 30 prime or subcontracts benefited DBEs from the Hispanic population; through 49 prime or subcontracts, the Sub-continental Asian American population benefited from \$1.7 million enterprise investment; Asian Pacific American enterprises benefited from \$3.8 million investments through 50 prime or subcontracting opportunities; and non-minority women benefited from 48 prime or subcontracting business opportunities, grossing a total of \$2.8 million enterprise investments (see Table 10). Since some contracts and subcontracts are carried over into another fiscal year and some others are multi-year or straddled over several years, an accurate reporting of implemented contracts or ongoing contracts are quite impossible to capture. However, the reports provided here are the best the system can

⁴ MDOT has established a DBE program in accordance with regulations of the U.S. Department of Transportation (USDOT) at 49 CFR Part 26. This report can be found at <http://mdot270.state.mi.us:8080/UCP/forms/Program%20Procedures%20Revised%207%2010%2009.pdf>

capture and are so reported in the annual submission requirement to the appropriate FHWA officials and offices.

Table 10: DBE Commitments/Awards this Reporting Period: Breakdown by Ethnicity and Gender, 2010

DBE commitments/Awards this Reporting Period - breakdown by ethnicity & Gender		
	Total Number of contracts (Prime and Sub)	Total Dollar Value (\$)
Black American	18	\$ 916,531.77
Hispanic American	30	\$ 1,307,894.22
Native American	0	\$ -
Subcont. Asian American	49	\$ 1,757,732.04
Asian-Pacific American	50	\$ 3,871,107.96
Non-Minority Women	48	\$ 2,865,163.21
Other (i.e not of any other group listed here)	0	\$ -
Totals	195	\$ 10,718,429.20

Findings and Recommendations

The process set out in this analysis and the methodology followed herewith is expected to feed into how improvements can be made in MDOT process of project selection and project implementation. The following recommendations are suggested in order to improve the implementation of the FY 2012 - 2016 CFP.

1. Program managers in the regions and TSC offices should give special considerations to public involvement procedures and public participation process when implementing the several projects identified as EJ-significant projects in this analysis.
2. As identified in this list, new route or new road projects, major widening and minor widening projects may/may not have significant impact but involving the identified groups early in the process will encourage voluntary participation and trust in the public.
3. Considerations should be given to the classification of groups identified as affected groups on the list (see Appendix A, column title "EJ Sign."). Adequate involvement may require special ways of reaching out, and encouraging such identified populations groups will spur public understanding our MDOT processes and further encourage or earn citizen trust and participation in project development.
4. Program managers should solicit project planning section staff experience and recommendations on the best way and methods to get messages out to such identified groups.

5. It is important that all treatment, involvement or mitigation plans be well documented for record purposes.

In light of the analysis stated above, MDOT certifies that the process used in identifying projects on the FY 2012 - 2016 CFP program:

- Complies with Title VI Civil rights Act of 1964 and the EJ Executive Order 12898 of 1994 and all other related regulations and directives therein.
- Ensures that people affected by MDOT programs and projects will receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin, age, sex, or disability.
- Ensures and prevents any form of discrimination in MDOT programs and activities, whether those programs and activities are federally funded or not.

APPENDIX A