

EJ Analysis – County Line Road Added Travel Lanes

Des No 2002553

Under FHWA Order 6640.23A, FHWA and the project sponsor, as a recipient of funding from FHWA, are responsible to ensure that their programs, policies, and activities do not have a disproportionately high and adverse effect on minority or low-income populations. Per the current INDOT Categorical Exclusion Manual, an Environmental Justice (EJ) Analysis is required for any project that has two or more relocations or 0.5 acre of additional permanent right-of-way. The project will require acquisition of approximately 20 acres of permanent right-of-way and nine relocations. Therefore, an EJ Analysis is required.

Potential EJ impacts are detected by locating minority and low-income populations relative to a reference population to determine if populations of EJ concern exist and whether there could be disproportionately high and adverse impacts to them. The reference population may be a county, city or town and is called the community of comparison (COC). In this project, since the project is located in two counties, the COC is an aggregate of Perry Township in Marion County and White River Township in Johnson County. The community that overlaps the project area is called the affected community (AC) and is compared to census tract or block group information, depending on the availability of data. In this project, the affected communities are Block Groups 1 and 2 of Census Tract 6106.03, Block Group 2 of 6106.04, and Block Group 1 of 6106.06 in Johnson County; and Block Group 2 of Census Tract 3801 and Block Groups 3 and 4 of Census Tract 3812.01 in Marion County.

An AC has a population of concern for EJ if the population is more than 50% minority or low-income or if the low-income or minority population is 125% of the COC. Data from the 2019 American Community Survey was obtained from the US Census Bureau Website <https://data.census.gov> on August 20, 2021 by HNTB. The data collected for low-income and minority populations within the AC are summarized in the tables below.

Low-Income Data (American Community Survey, 2019) – Block Groups									
	COC: White River Township Combined with Perry Township	Block Group 1, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.04, Johnson County	Block Group 1, Census Tract 6106.06, Johnson County	Block Group 2, Census Tract 3801, Marion County	Block Group 3, Census Tract 3812.01, Marion County	Block Group 4, Census Tract 3812.01, Marion County	
Percent Low-Income	10.79%	9.04%	0%	1.13%	0%	15.44%	5.71%	1.23%	
125% of COC	13.48%	AC < 125% COC	AC > 125% COC	AC < 125% COC	AC < 125% COC				
EJ Population of Concern		No	No	No	No	Yes	No	No	

Block Group 1 of Census Tract 6106.03 has a percent low-income of 9.04%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.03 does not contain low-income populations of EJ concern.

Block Group 2 of Census Tract 6106.03 has a percent low-income of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.03 does not contain low-income populations of EJ concern.

Block Group 2 of Census Tract 6106.04 has a percent low-income of 1.13%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.04 does not contain low-income populations of EJ concern.

Block Group 1 of Census Tract 6106.06 has a percent low-income of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.06 does not contain low-income populations of EJ concern.

Block Group 2 of Census Tract 3801 has a percent low-income of 15.44%, which is below 50% but is greater than the 125% COC threshold. Therefore, Block Group 2 of Census Tract 3801 does contain a low-income population of EJ concern.

Block Group 3 of Census Tract 3812.01 has a percent low-income of 5.71%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 3 of Census Tract 3812.01 does not contain low-income populations of EJ concern.

Block Group 4 of Census Tract 3812.01 has a percent low-income of 1.23%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 4 of Census Tract 3812.01 does not contain low-income populations of EJ concern.

Minority Data (American Community Survey, 2019) – Block Groups									
	COC: White River Township Combined with Perry Township	Block Group 1, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.04, Johnson County	Block Group 1, Census Tract 6106.06, Johnson County	Block Group 2, Census Tract 3801, Marion County	Block Group 3, Census Tract 3812.01, Marion County	Block Group 4, Census Tract 3812.01, Marion County	
Percent Minority	21.3%	0	0	0	6.5%	4.7%	8.9%	18.3%	
125% of COC	26.6%	AC < 125% COC	AC < 125% COC	AC < 125% COC	AC < 125% COC				
EJ Population of Concern		No	No	No	No	No	No	No	

Block Group 1 of Census Tract 6106.03 has a percent minority of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.03 does not contain minority populations of EJ concern.

Block Group 2 of Census Tract 6106.03 has a percent minority of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.03 does not contain minority populations of EJ concern.

Block Group 2 of Census Tract 6106.04 has a percent minority of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.04 does not contain minority populations of EJ concern.

Block Group 1 of Census Tract 6106.06 has a percent minority of 6.5%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.06 does not contain minority populations of EJ concern.

Block Group 2 of Census Tract 3801 has a percent minority of 4.7%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 3801 does not contain minority populations of EJ concern.

Block Group 3 of Census Tract 3812.01 has a percent minority of 8.9%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 3 of Census Tract 3812.01 does not contain minority populations of EJ concern.

Block Group 4 Census Tract 3812.01 has a percent minority of 18.3%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 4 of Census Tract 3812.01 does not contain minority populations of EJ concern.

Mobile Home Communities:

Three mobile home communities are located within the project area on the south side of County Line Road in Johnson County, just west of Peterman Road / CR 400 S. Although the census data does not indicate that there is an EJ population of concern present in the Block Groups containing these communities, mobile home communities can often be low-income communities of EJ concern. Therefore, this portion of the project area is being considered an EJ community of concern for the purpose of this analysis. The three mobile home communities are located in Block Groups 1 and 2 of Census Tract 6106.03. The entrance to the Shadybrook Mobile Home Park is being relocated by the project because it is currently too close to the County Line Road and Railroad Road / Peterman Road / CR 400 S intersection and the Indiana Rail Road tracks and cross arms. The entrance will be moved further west and will require the relocation of a community mailbox structure.

Benefits and Burdens of the Project:

Once potential EJ communities are identified, the next step is to determine if they are expected to experience a disproportionately high and adverse impact from the project. The FHWA and USDOT EJ Orders state that “disproportionately high and adverse” refers to an adverse effect that (1) is predominately borne by a minority population and/or a low-income population; or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

The proposed County Line Road project includes added travel lanes, correction of a steep incline at the Morgantown Road intersection, replacement of two bridges, construction of a 10-foot multipurpose trail on the north side of County Line Road, and construction of a 6-foot sidewalk on the south side of County Line Road. In addition, the eastern intersection of Morris Road and County Line Road and the intersection of Mount Pleasant East Street and County Line Road will be permanently eliminated, and cul-de-sacs will be constructed. A new entrance to the Mount Pleasant neighborhood will be constructed on the southwest corner of the neighborhood connecting to Mount Pleasant South Street to N. Bluff Road. Overall, the project will require approximately 20 acres of new permanent right-of-way and nine relocations.

The following benefits and burdens have been identified as potential considerations in determining whether the populations of EJ concern will experience disproportionately high and adverse impacts from the project.

Benefits

- Reduced travel time and congestion – The area currently experiences congestion due to limited capacity of the two lane roadway and the stop controlled intersection of Railroad Road / Peterman Road / CR 400 S. Congestion is expected to increase after the new I-69 interchange with County Line Road is constructed. The added capacity and mobility from the proposed County Line Road project and the signalization of Railroad Road / Peterman Road / CR 400 S intersection will result in reduced travel times and congestion which will benefit EJ and non-EJ populations similarly.
- Improved safety outcomes – The sight distance correction at the steep hill at the Morgantown Road intersection, the addition of the two way left turn lane, the addition of sidewalk and multi-use trail, and the addition of pedestrian crossings within the project area will improve safety throughout the project area. The improved site distance is expected to reduce crashes in the area of the hill, and the addition of sidewalk, multiuse trail, and dedicated pedestrian crossings at intersections will increase safety for pedestrians. There are currently no sidewalks along County Line Road within the project area. This increased safety will benefit EJ and non-EJ populations similarly.
- Increased recreational opportunity and pedestrian mobility - Construction of the multi-use trail will benefit pedestrians and cyclists from the project area and surrounding communities by providing recreational opportunities and safe access to the commercial amenities east of the project area, especially those without reliable vehicular transportation. This increased recreational opportunity and mobility will benefit EJ and non-EJ populations similarly.

Burdens

- Residential property displacements - The data for Census Tract 3801 Block Group 2 in Marion County indicates that it has a low-income EJ population. Census Track 3801 Block Group 2 extends from SR 37 east to Railroad Road and from County Line Road north to Stop 11 Road and includes approximately 1,081 households. Two residential relocations are expected in the portion of the project area covered by this block group.

No other Block Groups were identified within the project limits as containing potential EJ populations. Seven residential relocations are expected within the project limits outside of the Block Group of EJ concern. No residential relocations are expected in the identified mobile home communities. Non-EJ communities will be impacted by more residential relocations than EJ communities.

- Right-of-way acquisition – In order to construct the project, strip right-of-way acquisition will be necessary throughout the project area. This right-of-way acquisition will impact the yards of homes directly adjacent to the project area. A total of 6 acres of permanent right-of-way will be required from the identified EJ communities, and 14 acres of permanent right-of-way will be required from non-EJ communities. Non-EJ communities will be impacted by more right-of-way acquisition than EJ communities.

- Reduced access to the residential communities – Construction of the project will require changes in access at the intersection of County Line Road and Mount Pleasant East Street and the eastern intersection of Morris Road and County Line Road. The proposed project will change these two intersections to cul-de-sacs. These changes are necessary due to the lowering of the roadway in order to meet vertical site distance standards and improve safety.

The impacts to Morris Road will be minor. This street is 1,500 feet long and provides access to 15 homes. After converting the eastern intersection of Morris Road to a cul-de-sac, approximately 630 feet west of the Morgantown Road intersection, residents will still have full access to the western intersection of Morris Road with County Line Road. Morris Road is located within the identified EJ community of Census Tract 3801 Block Group 2.

Access changes to the Mount Pleasant community located on the south side of County Line Road will require closure of the intersection of County Line Road with Mount Pleasant East Street, approximately 380 feet west of the Morgantown Road intersection. Approximately 110 homes are located on Mount Pleasant North Street, Mount Pleasant Center Street, Mount Pleasant South Street, Mount Pleasant West Street and Mount Pleasant East Street and the neighborhood currently has three access points: Mount Pleasant West Street at County Line Road, Mount Pleasant East Street at County Line Road, and Mount Pleasant Center Street at Morgantown Road. Although outside of this County Line Road project's limits, the intersection of Mount Pleasant West Road and County Line Road is located approximately 365 feet east of State Road 37 and will be removed as part of the I-69 project. The current intersection will be converted to a T-road with no access to County Line Road or Bluff Road. Therefore, the reasonably foreseeable cumulative impact to the neighborhood will be a reduction of the number of access points to the neighborhood from three to one. As a measure to mitigate the impact of the reduction in access to the community, the project will construct an additional entrance on the southwest corner of the neighborhood that will connect to N. Bluff Road. The Mount Pleasant Community has not been identified as an EJ community. Based on changes to community access, the non-EJ community in the Mount Pleasant neighborhood and the Morris Road residents located within the identified EJ community in Census Tract 3801 will be impacted similarly by reduced access.

- Tree clearing necessary for construction – Due to the construction of the added travel lanes and improvements to drainage in the project area, approximately 10 acres of trees will be removed throughout the project area. EJ and non-EJ populations will be impacted similarly by the potentially negative impacts of reduced aesthetics and shade availability.
- Temporary inconveniences, dust, noise, etc. – During construction, temporary travel inconveniences, as well as increase in dust and noise will similarly impact EJ and non-EJ populations. These impacts will cease with completion of the project.
- Air quality and noise impacts from increased roadway capacity – The additional capacity of the widened County Line Road could potentially bring localized areas of decreased air quality and increased roadway noise. However, air quality may also be improved due to decreased vehicle idling time brought about by the reduction in congestion along the roadway. As discussed in the Noise section of this CE document, the change in predicted future noise levels over existing noise levels ranged from 2.2 to 6.7 dBA. Therefore, none

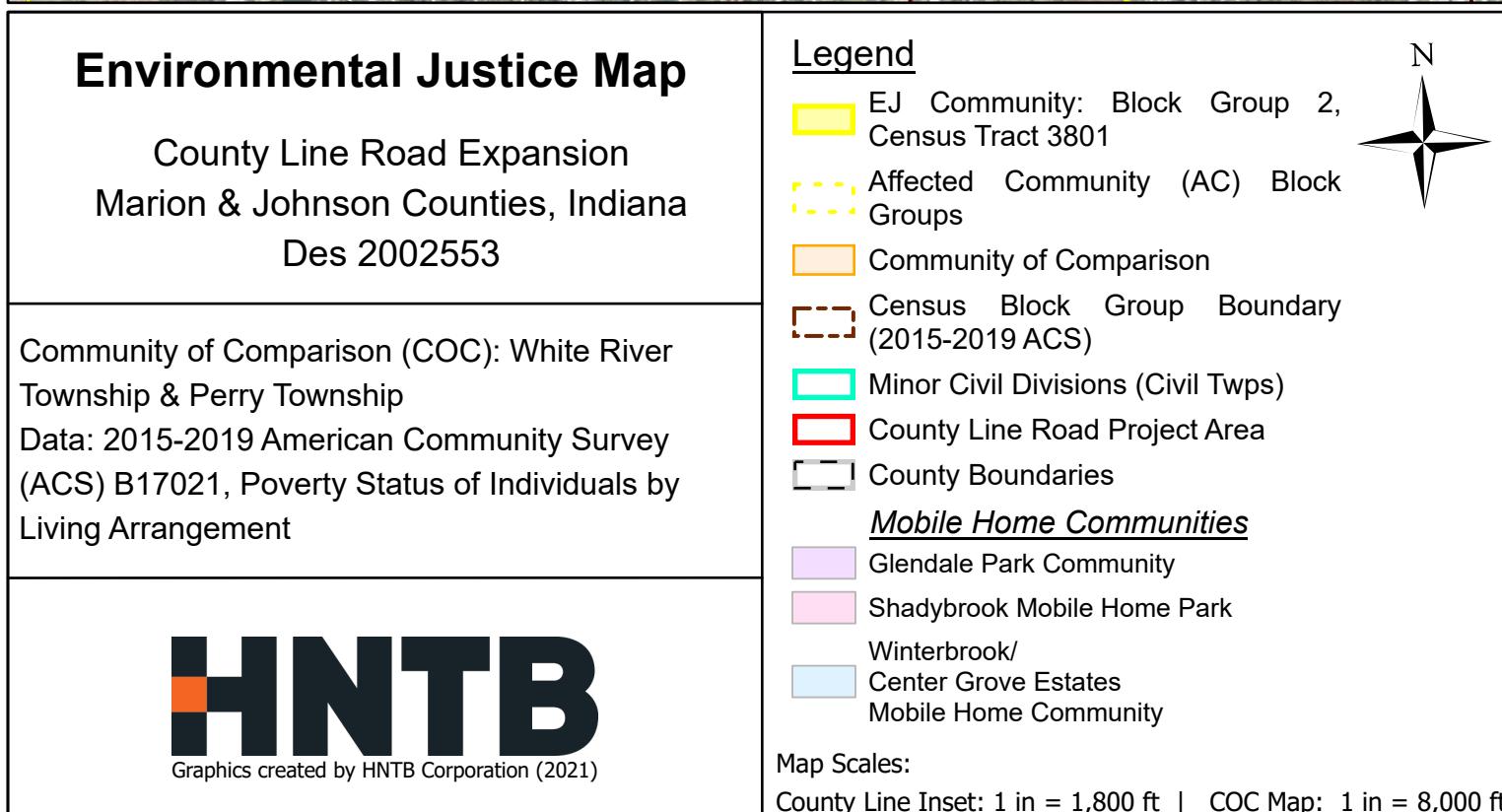
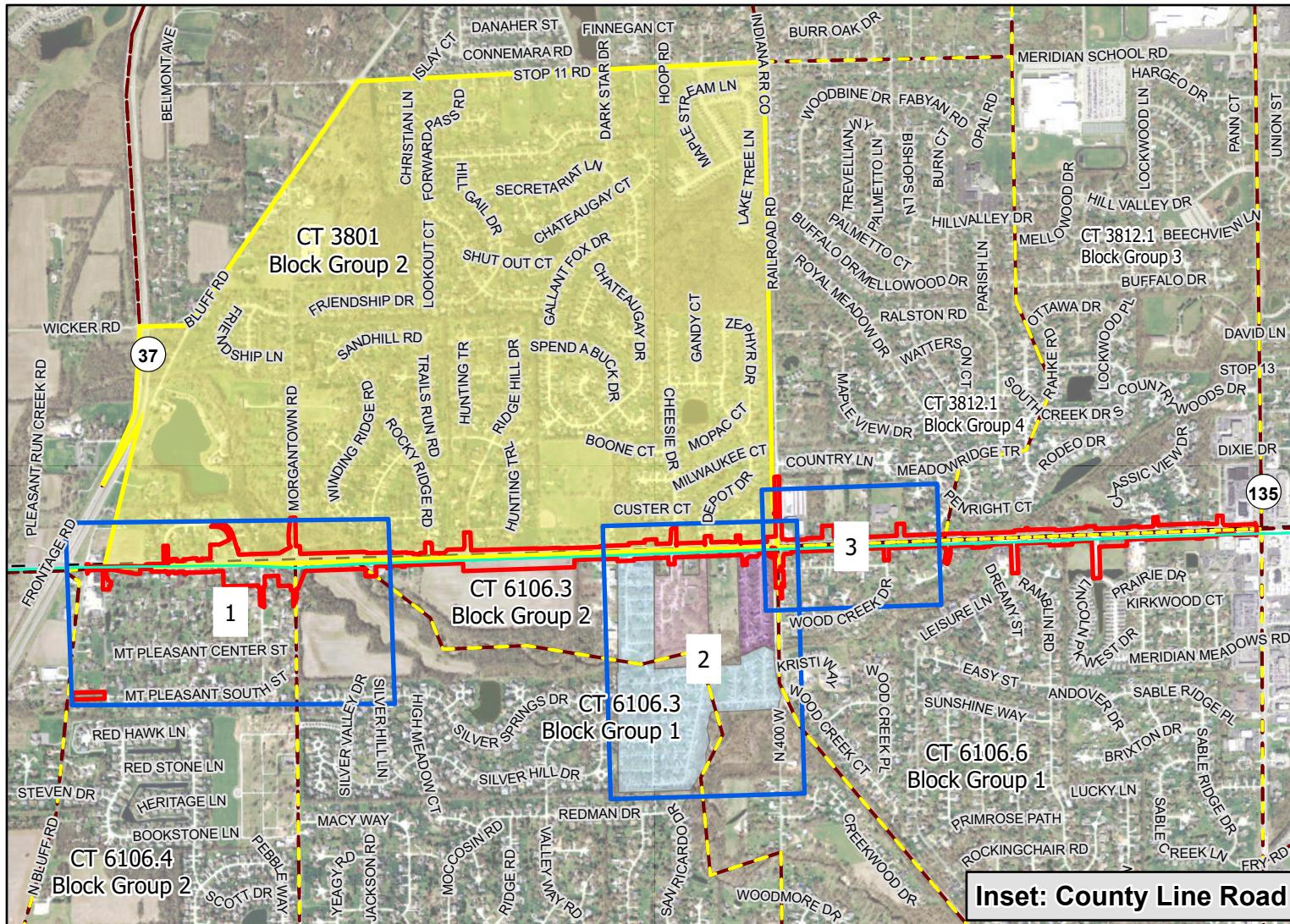
of the predicted future noise levels would substantially exceed existing noise levels. Any possible changes in air quality or noise will impact EJ and non-EJ populations similarly.

Conclusion:

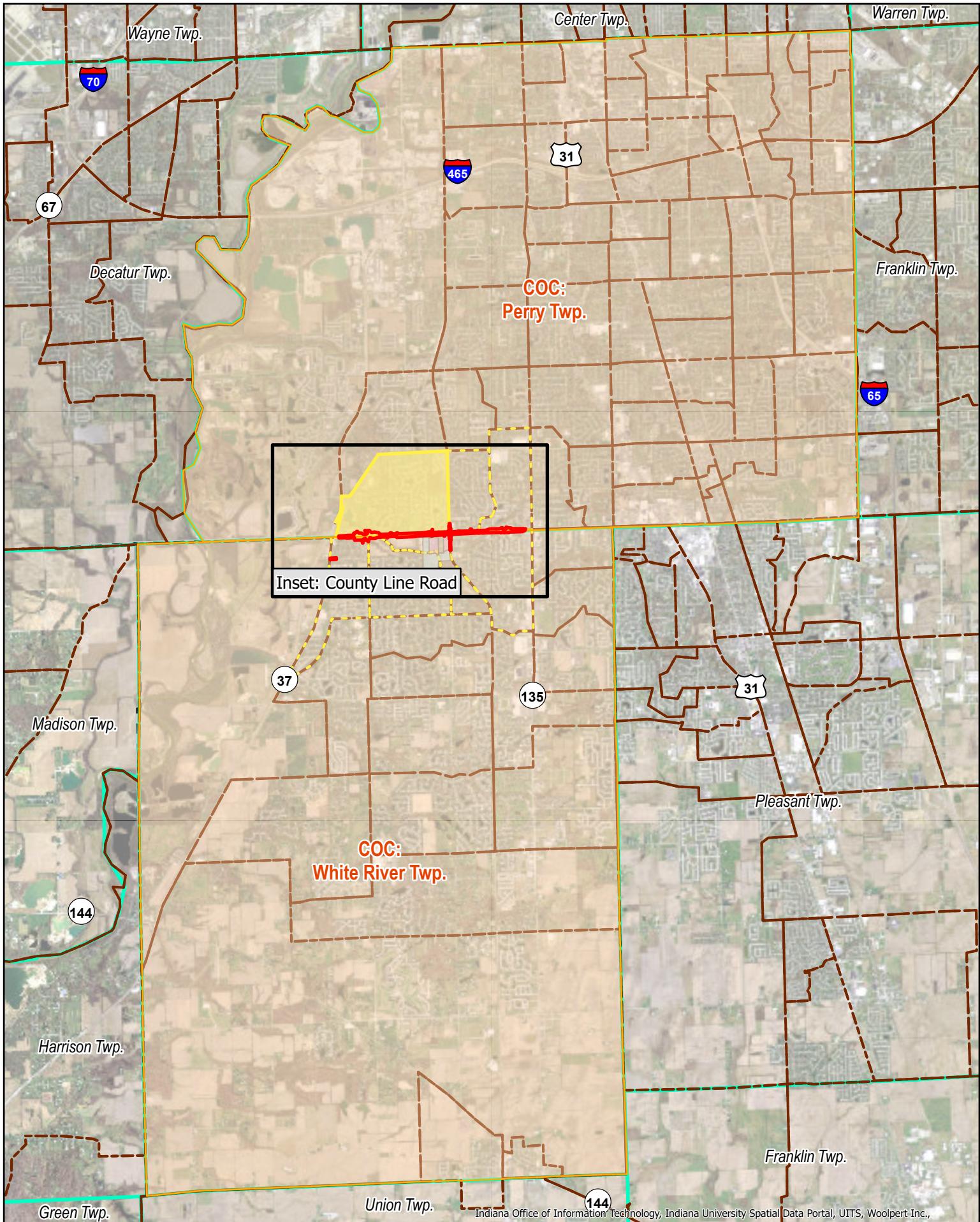
Although this project will cause some potentially adverse impacts to the community, those impacts have been reduced as much as possible by the project design. In addition, those burdens will be experienced among both EJ and non-EJ populations, with more relocations and right-of-way acquisition from non-EJ communities. The positive impacts of the project will equally benefit EJ and non-EJ populations. Therefore, the identified populations of EJ concern are not expected to experience a disproportionately high and adverse impact from the project.

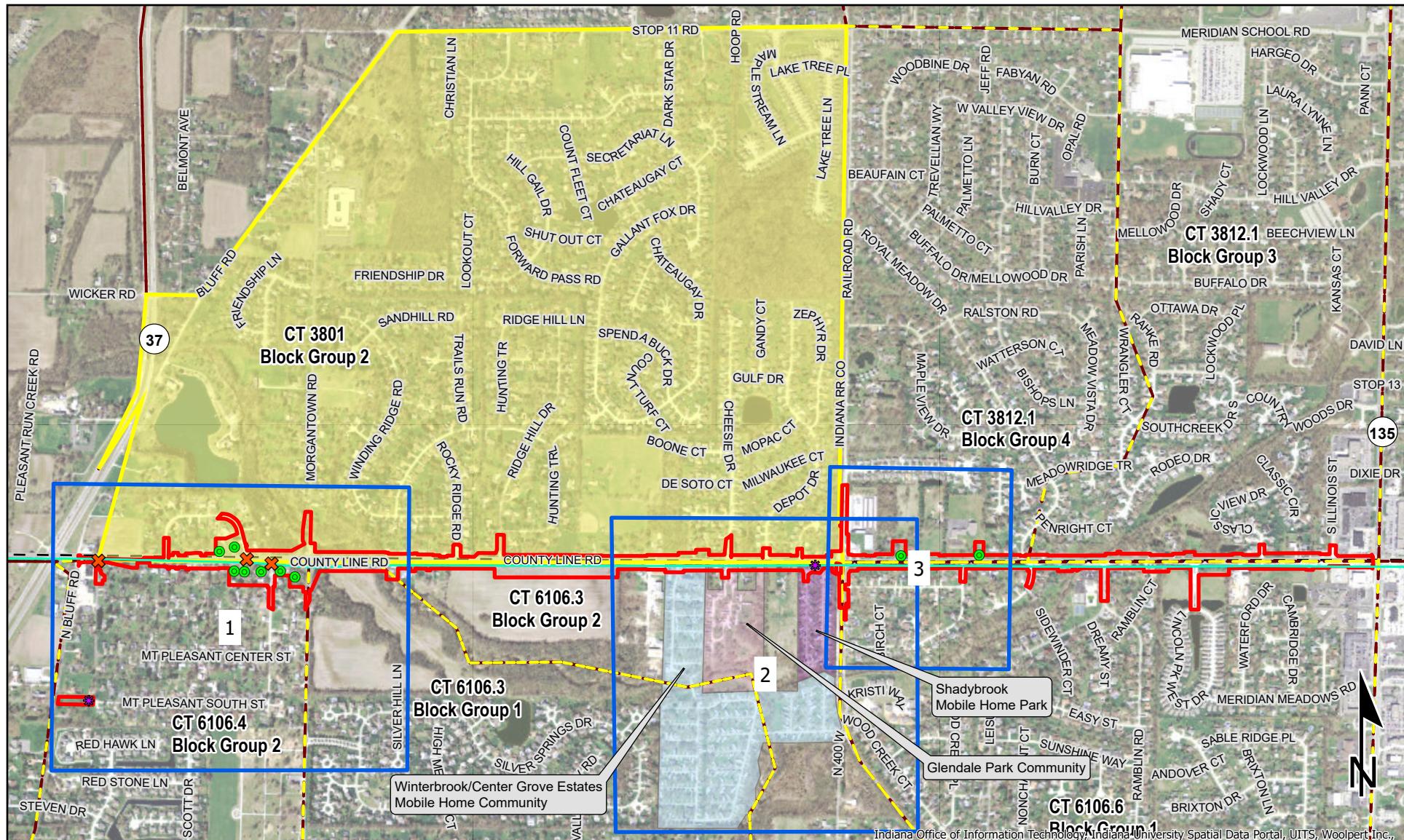
Table 1: Analysis of Potential Burdens of the Project

	Residential Relocations	ROW Acquisition	Changed Community Access	Tree Clearing	Air Quality and Noise Impacts due to Increased Capacity	Temporary impacts of dust, noise, etc.
EJ Community – Census Tract 3801, Block Group 2	2	4.85 acres permanent; 2.45 acres temporary	Yes – Morris Road will be closed at County Line Road	Yes	Possible	Yes
EJ Community – Winterbrook/Center Grove Estates Mobile Home Community	None	0.32 acre permanent; 0.37 acre temporary	No	Yes	Possible	Yes
EJ Community – Glendale Park Community	None	0.20 acre permanent; 0.28 acre temporary	No	Yes	Possible	Yes
Shadybrook Mobile Home Park	None	0.39 acre permanent; 0.35 acre temporary	Yes – Access Road will be relocated to the west	Yes	Possible	Yes
Non-EJ Communities	7	14.1 acres permanent; 3.71 acres temporary	Yes – Mount Pleasant Street East will be closed at County Line Road. A new local access road will be constructed to connect with N. Bluff Road	Yes	Possible	Yes



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County Line Road Project Area Map: Environmental Justice

County Line Road Expansion
Marion & Johnson Counties, Indiana

Des. No. 2002553

1 inch = 1,400 ft

HNTB

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Permanent Road Closures

Proposed Relocations

Change of Access

EJ Community: Block Group 2, Census Tract 3801

Block Group Boundaries: 2015-2019 ACS

Affected Community (AC)
Block Groups

County Line Road Project Area

Map Page

Minor Civil Divisions (Civil Twps)

County Boundaries

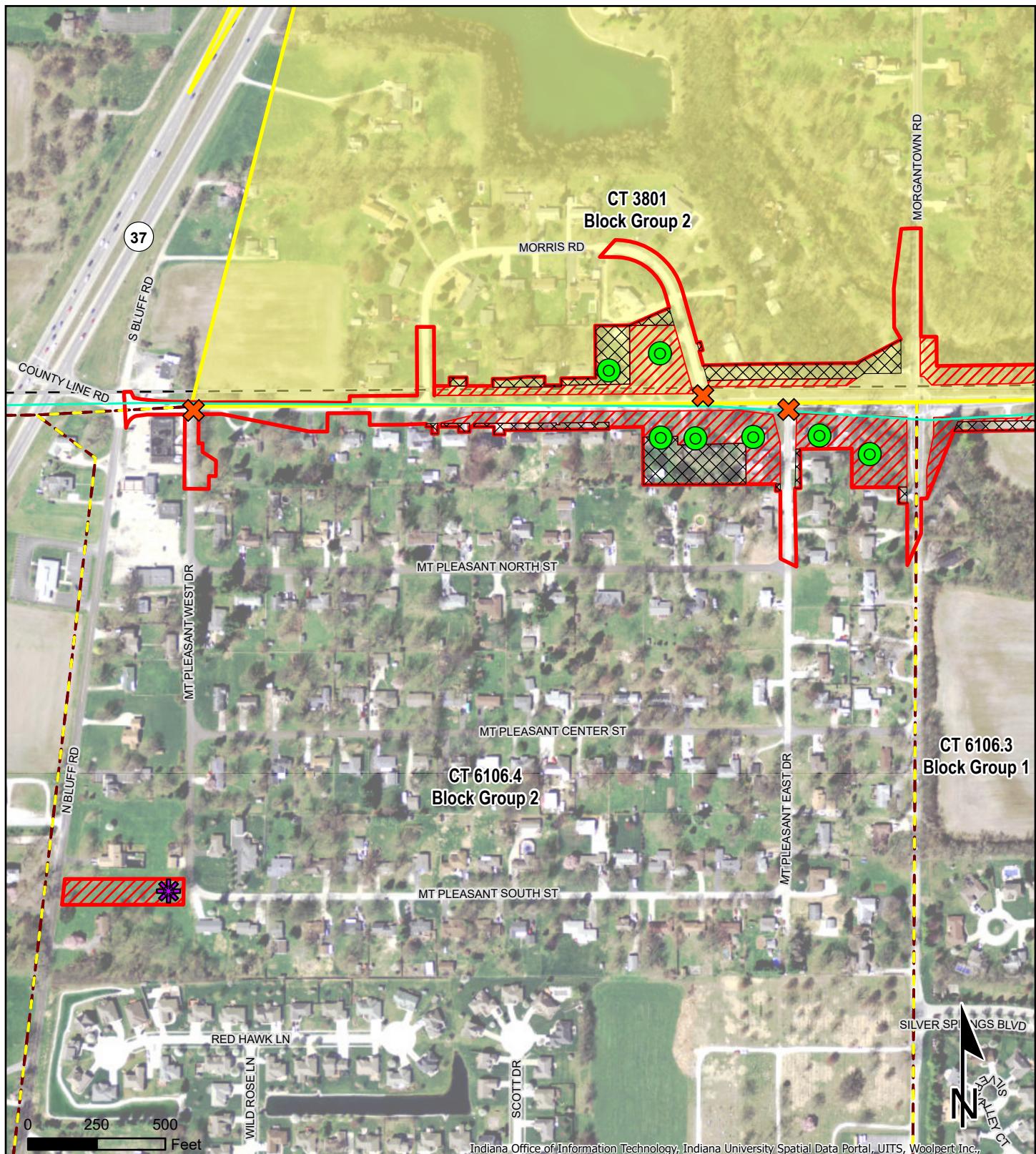
Mobile Home Parks

Glendale Park Community

Shadybrook Mobile Home Park

Winterbrook/Center Grove Estates Mobile Home Community

0 700 1,400
Feet



Environmental Justice Map: Inset 1

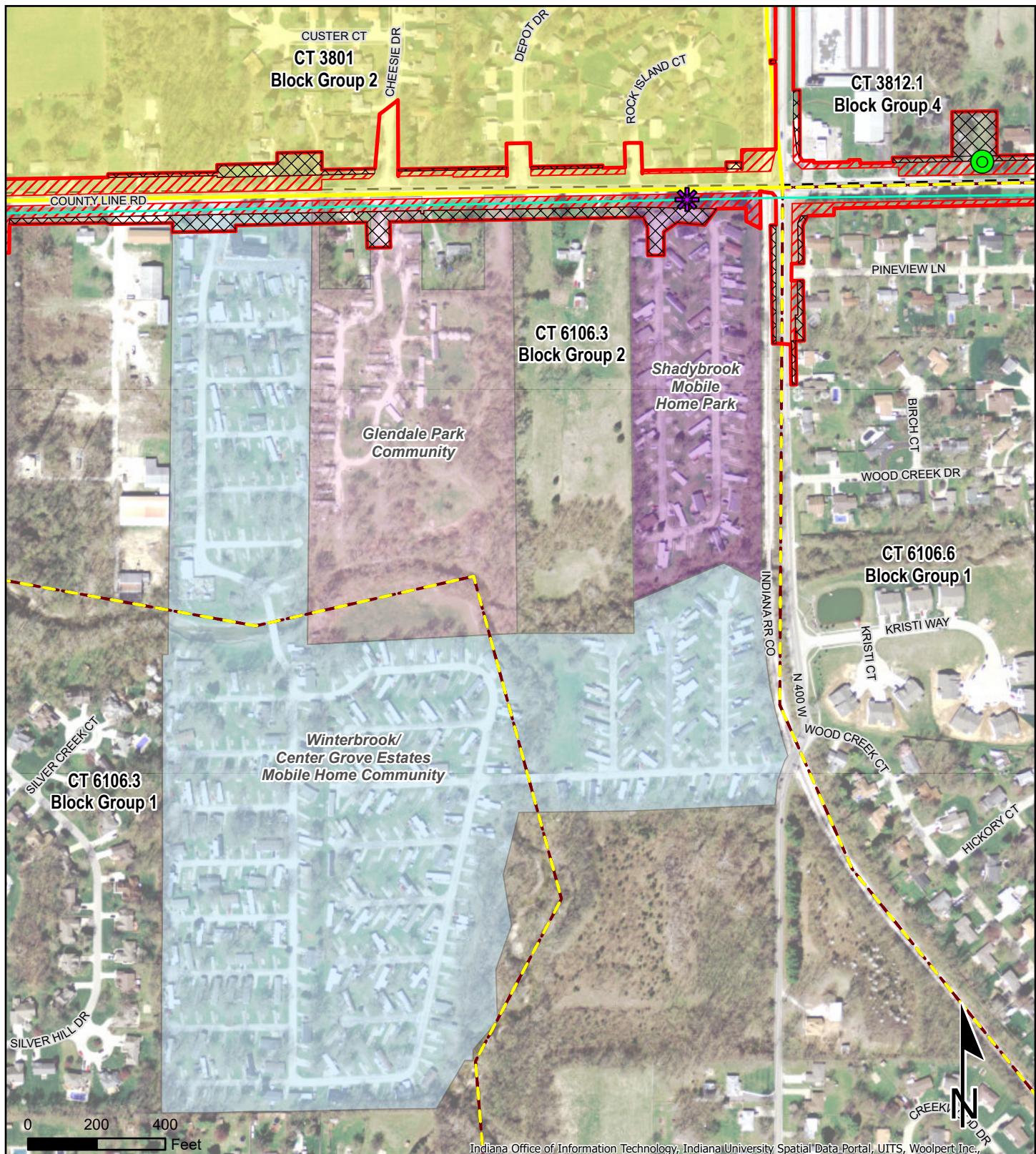
County Line Road Expansion
Marion & Johnson Counties, Indiana
Des No. 2002553



Graphics created by HNTB Corporation (2021)

Scale:
1 in = 500 ft

- EJ Community: Block Group 2, Census Tract 3801
- Permanent Road Closures
- Affected Community (AC) Block Groups
- Proposed Relocations
- Change of Access
- Minor Civil Divisions (Civil Twps)
- Proposed New Right-of-Way
- Block Group Boundaries: 2015-2019 ACS
- Proposed Temporary Right-of-Way
- County Boundaries
- Mobile Home Parks
 - Glendale Park Community
 - Shadybrook Mobile Home Park
 - Winterbrook/Center Grove Estates Mobile Home Community
- Map Page



Environmental Justice Map: Inset 2

County Line Road Expansion
Marion & Johnson Counties, Indiana
Des No. 2002553

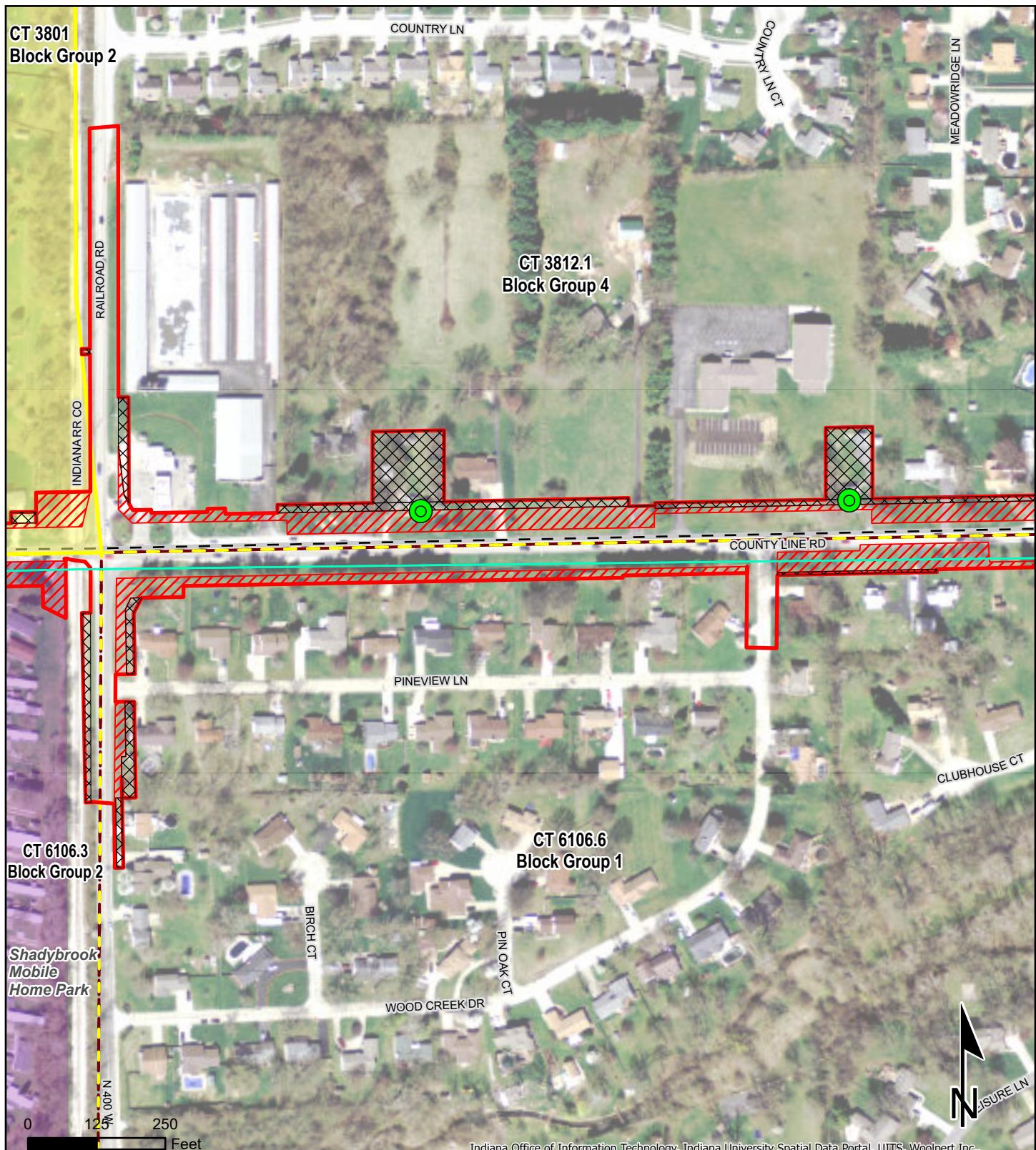
HNTB

Graphics created by HNTB Corporation (2021)

Scale:
1 in = 400 ft

This legend provides a key for the map, identifying the following features:

- EJ Community: Block Group 2, Census Tract 3801** (Yellow box)
- Affected Community (AC) Block Groups** (Yellow box)
- Block Group Boundaries: 2015-2019 ACS** (Red line)
- Minor Civil Divisions (Civil Twps)** (Teal box)
- County Line Road Project Area** (Red box)
- County Boundaries** (Grey box)
- Permanent Road Closures** (Red X)
- Proposed Relocations** (Green circle)
- Change of Access** (Purple asterisk)
- Proposed New Right-of-Way** (Red diagonal line)
- Proposed Temporary Right-of-Way** (Red diagonal line with cross)
- Mobile Home Parks**
 - Glendale Park Community** (Light purple box)
 - Shadybrook Mobile Home Park** (Dark purple box)
- Winterbrook/Center Grove Estates Mobile Home Community** (Light blue box)



Environmental Justice Map: Inset 3

County Line Road Expansion
Marion & Johnson Counties, Indiana
Des No. 2002553



Graphics created by HNTB Corporation (2021)

Scale:
1 in = 250 ft

- EJ Community: Block Group 2, Census Tract 3801
- Affected Community (AC) Block Groups
- Block Group Boundaries: 2015-2019 ACS
- Minor Civil Divisions (Civil Twps)
- County Line Road Project Area
- County Boundaries
- Permanent Road Closures
- Proposed Relocations
- Change of Access
- Proposed New Right-of-Way
- Proposed Temporary Right-of-Way

Mobile Home Parks

- Glendale Park Community
- Shadybrook Mobile Home Park
- Winterbrook/Center Grove Estates Mobile Home Community

From: Fair, Terri <TFair@indot.IN.gov>
Sent: Friday, January 21, 2022 11:57 AM
To: Susan Harrington
Cc: Bales, Ronald; Christine Meador
Subject: FW: Environmental Justice Analysis for County Line Road Added Travel Lanes - Des 2002553
Attachments: [1.21.22 Des. No. 2002553_CL Road_EJ Analysis.pdf](#)

INDOT-Environmental Services Division (ESD) has reviewed the project information along with the Environmental Justice (EJ) Analysis for the above referenced project. With the information provided, the project may require right-of-way. Relocations are anticipated. With the information provided, the relocations would not disrupt community cohesion or create a physical barrier. INDOT-ESD would not consider the impacts associated with this project as causing a disproportionately high and adverse effect on minority and/or low-income populations of EJ concern relative to non EJ populations in accordance with the provisions of Executive Order 12898 and FHWA Order 6640.23a. No further EJ Analysis is required.