

ENVIRONMENTAL JUSTICE ANALYSIS



“A prosperous, equitable, and resilient region with abundant opportunities for all to live, work, play, and thrive.” The statement builds off of the regional values and goals set by the Met Council to guide our policy work.

Regional core values

Equity | Leadership | Accountability | Stewardship

Regional goals

Our region is equitable and inclusive

Racial inequities and injustices experienced by historically marginalized communities have been eliminated; and all residents and newcomers feel welcome, included, and empowered.

Our communities are healthy and safe

All our region’s residents live healthy, productive, and rewarding lives with a sense of dignity and wellbeing.

Our region is dynamic and resilient

Our region meets the opportunities and challenges faced by our communities and economy including issues of choice, access, and affordability.

We lead on addressing climate change

We have mitigated greenhouse gas emissions and have adapted to ensure our communities and systems are resilient to climate impacts.

We protect and restore natural systems

We protect, integrate, and restore natural systems to protect habitat and ensure a high quality of life for the people of our region.



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Introduction

As we look towards the future with the 2050 Transportation Policy Plan, our commitment to fostering an inclusive and equitable Minneapolis–Saint Paul region remains steadfast. This plan aims to ensure that the benefits of our transportation systems are shared by all, particularly those who have historically been marginalized in regional planning efforts. This includes communities of color, American Indians, low-income households, people with disabilities, and individuals with limited English proficiency. By addressing both federal requirements for environmental justice and the broader equity aspirations outlined in *Imagine 2050*, we are dedicated to creating a transportation network that connects everyone to opportunities for success, prosperity, and a high quality of life.

This appendix addresses federal requirements. Federal guidance for evaluating impacts is derived from Title VI of the Civil Rights Act of 1964, Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, and Executive Order 14096, Revitalizing Our Nation’s Commitment to Environmental Justice for All. Under the executive order, transportation plans and programs (1) must provide a fully inclusive public outreach program; (2) should not disproportionately impact minority and low-income communities, and (3) must assure the receipt of benefits by minority and low-income populations. The TPP addresses these three principles, which were considered throughout the decision-making process. The analysis section of this chapter discusses these in more detail. These principles must also be considered in the project design and implementation phases for future specific projects.

Regional guidance for pursuing equity and environmental justice is outlined in *Imagine 2050*, the Metropolitan Development Guide required by Minn. Stat. 473.145. More information is also included in the Equitable and Inclusive section of the Overview chapter of the Transportation Policy Plan.

In the following pages, the terms "people of color" and "low-income households" are used to address the federal environmental justice requirements for "minority and low-income." Where regional approaches to pursuing equity are discussed, broader language is used, such as "all races, ethnicities, incomes, and abilities."

Identification of populations

In comparison to the previous Transportation Policy Plan, this analysis now includes individuals with disabilities where a census tract contains a population exceeding the regional average, in addition to people of color and people with low incomes.

Federal guidance on Environmental Justice applies to low-income households, people of color, and people with disabilities. This guidance defines people of color as all persons who are not white/non-Latino. While Environmental Justice applies regardless of population size, identifying concentrations of potentially affected populations is useful for application to system-level planning.

For the purposes of regional analysis, regional percentages were calculated at the Census tract level for low-income households, people with disabilities, and people of color using the 2018-2022 American Community Survey. Under this analysis, 29.2% of the region's population are people of color or American Indians, 8.3% of the region's population live with incomes below 100% of the federal poverty level, and 17.7% of the region's population live with incomes below 185% of the federal poverty level. Additionally, under this analysis 10% of the region's population are people with disabilities. These regional percentages are used to identify Census tracts with populations above the regional percentage.

Qualitative Analysis of Plan Investments and Strategies

Specific policies and actions identified in the Transportation Policy Plan serve to create benefits or mitigate impacts to communities of color, low-income households, people with disabilities, and people with limited English proficiency. This section highlights specific plan policies and actions that support environmental justice and broader equity work. Following the discussion of plan strategies, a series of maps show the location of plan investments and the existing transportation system in relation to people of color, people with low incomes, and people with disabilities in the region.

Plan policies and actions

The Policies and Actions chapter includes all of the detail on these in relation to the plan's goals. This section summarizes areas where these address environmental justice or equity more broadly.

All work

Three policies guide all work, separate from those policies categorized by goals. These policies include actions that specifically identify equity as considerations or focus areas when ensuring the region has funding to achieve our goals and that asset management work and investments advance regional goals.

Our region is equitable and inclusive

The plan's equitable and inclusive goal includes five policies and 18 related actions. These policies address:

- engagement,
- meeting the needs of people with disabilities,
- gentrification and displacement caused by transportation investments,
- benefits and burdens of transportation investments, and
- repairing harms and impacts from past highway investments.

Other goals

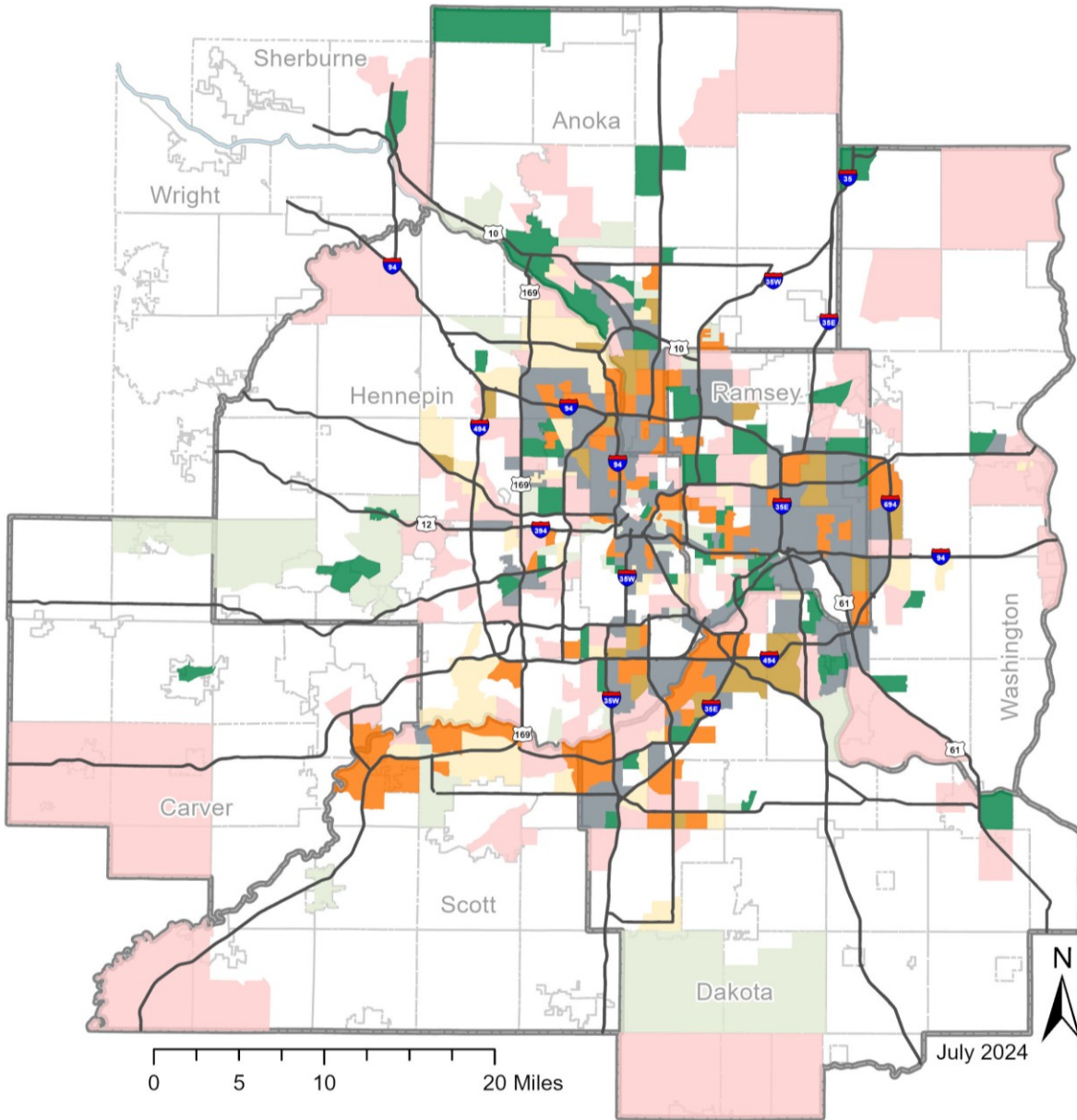
- The six policies for the healthy and safe goal address the needs of all road users, safety from crashes, repairing negative health impacts to overburdened communities, and a sense of place. Historically, transportation investment decisions have at times divided or displaced neighborhoods, especially creating harms for communities of color, people with low incomes, and people with disabilities. Actions to address these needs include directing investment focuses, specifying equitable enforcement strategies should be used for addressing speed in a safety context, and addressing racial profiling of those traveling on the regional transportation system.
- The 14 policies for the dynamic and resilient goal address providing better transportation options, recovery from disruptions, predictable travel times and goods movement. Supportive actions address ways to plan and invest in transportation options and climate mitigation.
- The three policies for the leading on addressing climate change goal include 17 supportive actions. These include some direction on prioritizing investments in areas that have been historically disadvantaged.
- The two policies for the protecting and restoring natural systems goal include 14 supportive actions for reducing impervious surface coverage or limiting right-of-way needs and using the regional transportation system to protect and restore natural systems.

Spatial analysis of investments

The following series of figures identifies the populations of color, people with disabilities, and low-income residents in the Twin Cities region, as well as the highway, bicycle system and transit investments within those areas.¹ Analysis of the location of projects relative to historically overburdened communities, as well as the location of their positive benefits and negative impacts is also recommended at the local and project level.

¹ U.S. Census, 2018-2022 American Community Survey 5-Year Estimates, tract level used in Figure 1-5

Figure 1. Population and existing highway system



Principal Arterial Highways

Regional Percentage by Tract

- Disability only
- POC only
- Poverty Only
- POC and Disability
- Poverty and Disability
- Poverty and POC
- ALL

People in Poverty

The Census defines individual poverty at two levels, 100% of poverty and 185% of poverty.

100% poverty regional percentage is 8.3%
 185% poverty regional percentage is 17.7%

Population of Color

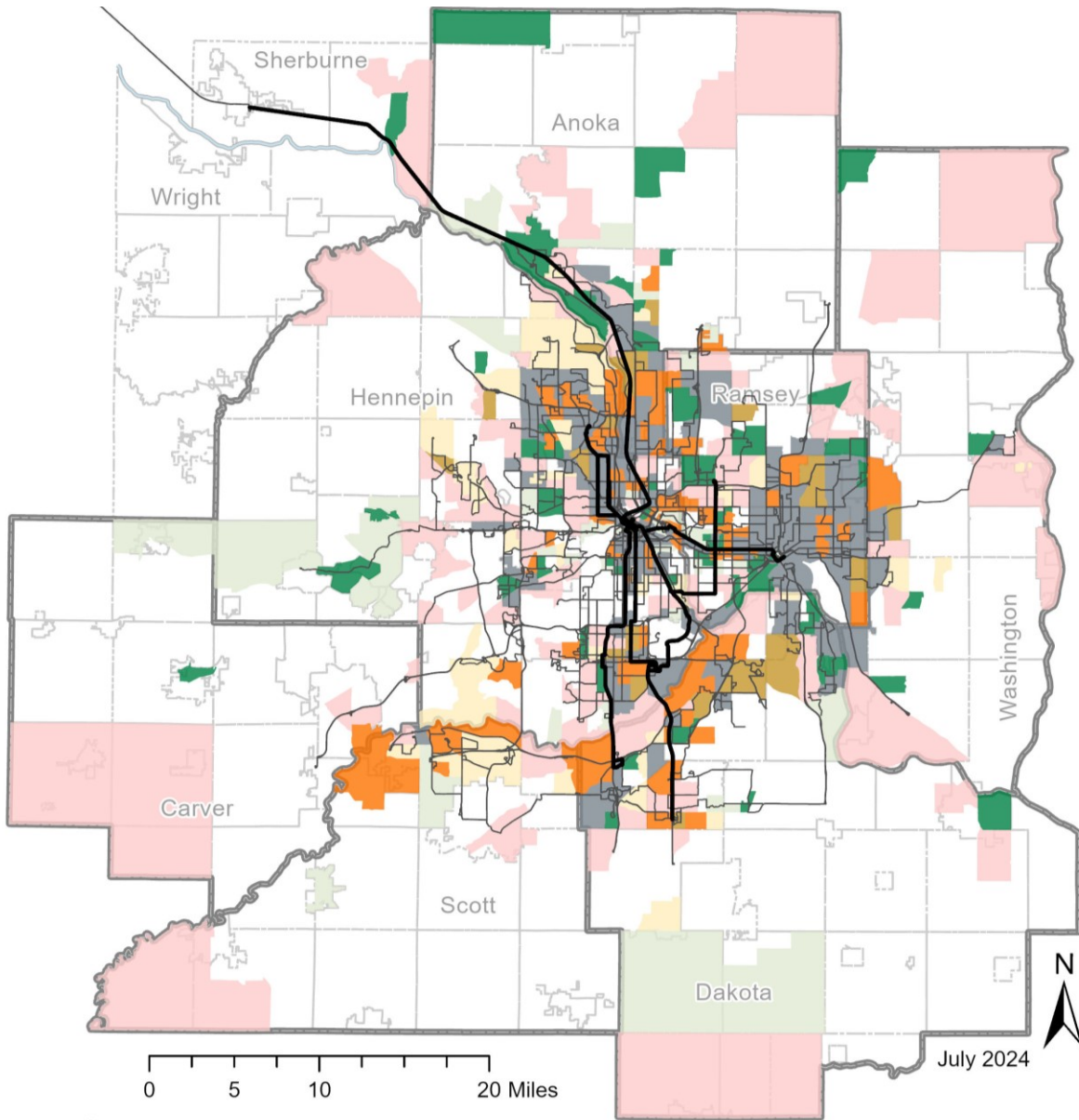
Population of Color is defined as all persons not classified as White, Non-Latino
 Regional percentage is 29.2%

People with Disabilities

The census includes information on many types of disabilities. The disability data here is "Any Disability". The regional percentage is 10.0%

This map highlights census tracts that are above the regional percentage for each population group.

Figure 2. Population and transitways



Existing Transitways
Regular Route Bus

Regional Percentage by Tract

- Disability only
- POC only
- Poverty Only
- POC and Disability
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People in Poverty

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Population of Color

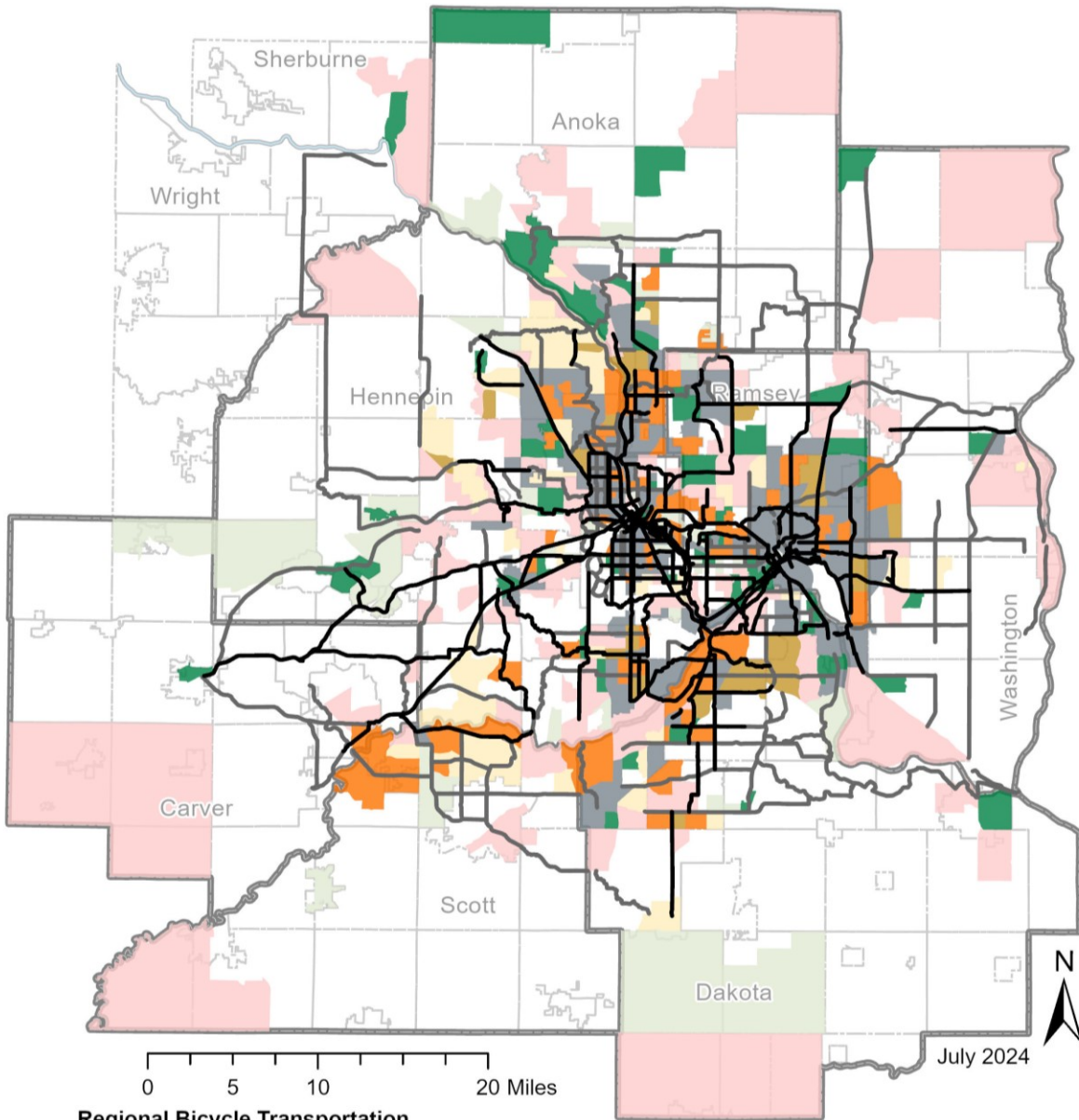
Population of Color is defined as all persons not classified as White, Non-Latino
Regional percentage is 29.2%

People with Disabilities

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The regional percentage is 10.0%

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Figure 3. Population and regional priority corridors for bicycle infrastructure



Regional Bicycle Transportation Network

- Tier 1 Alignment
- Tier 2 Alignment

Regional Percentage by Tract

- Disability only
- POC only
- Poverty Only
- POC and Disability
- Poverty and Disability
- Poverty and POC
- ALL

People in Poverty

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100% poverty regional percentage is 8.3%
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Population of Color

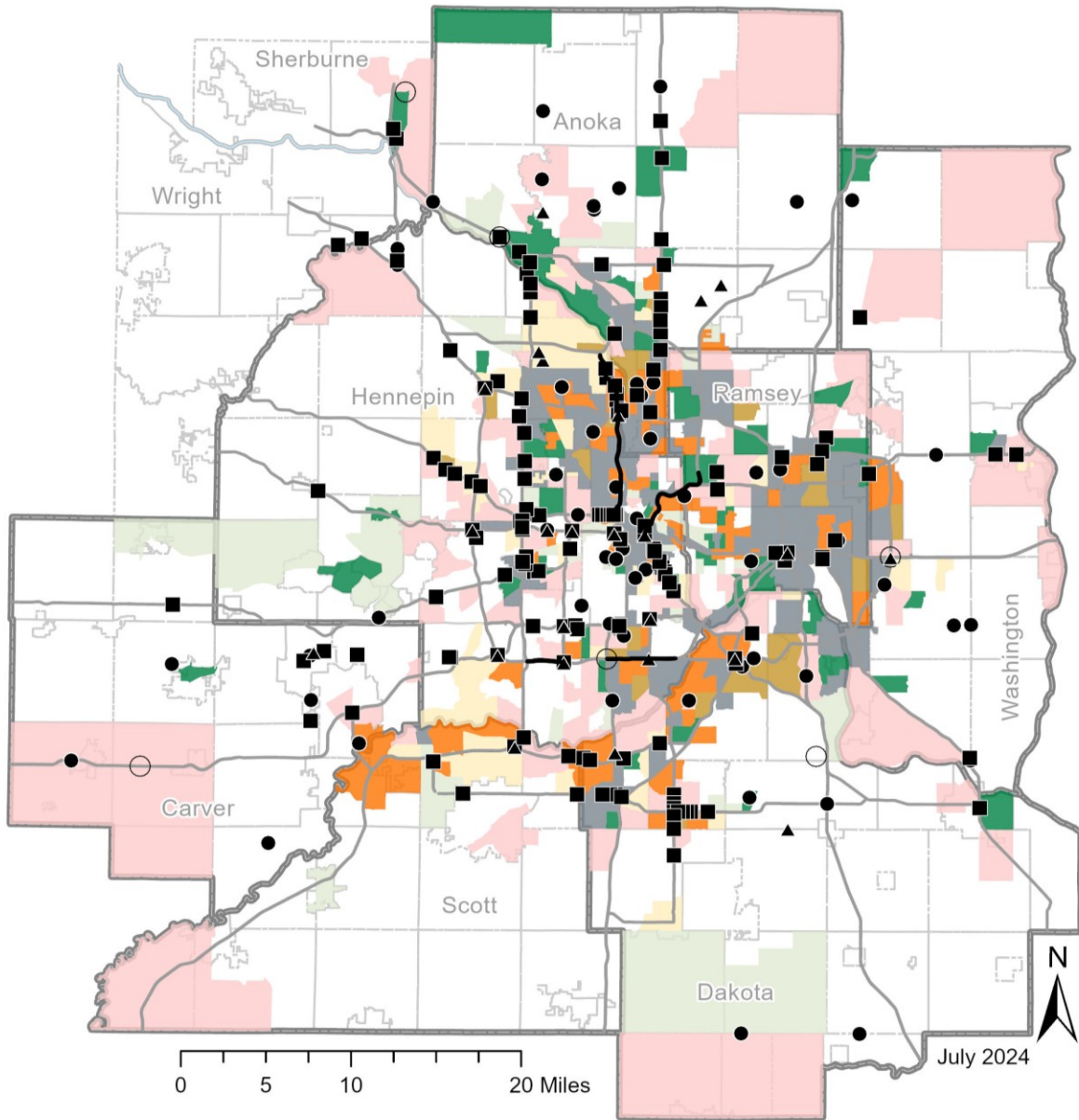
Population of Color is defined as all persons not classified as White, Non-Latino
 Regional percentage is 29.2%

People with Disabilities

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This map highlights census tracts that are above the regional percentage for each population group.

Figure 4. Population and 2050 highway investments



Funded Highway Projects

- ▲ Funded Targeted Regional Capacity
- Funded Spot Mobility
- Freight Program
- Funded Safety
- Funded Managed Lanes

Regional Percentage by Tract

- Disability only
- Poverty and Disability
- POC only
- Poverty and POC
- Poverty Only
- ALL
- POC and Disability

People in Poverty

The Census defines individual poverty at two levels, 100% of poverty and 185% of poverty.

100% poverty regional percentage is 8.3%
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Population of Color

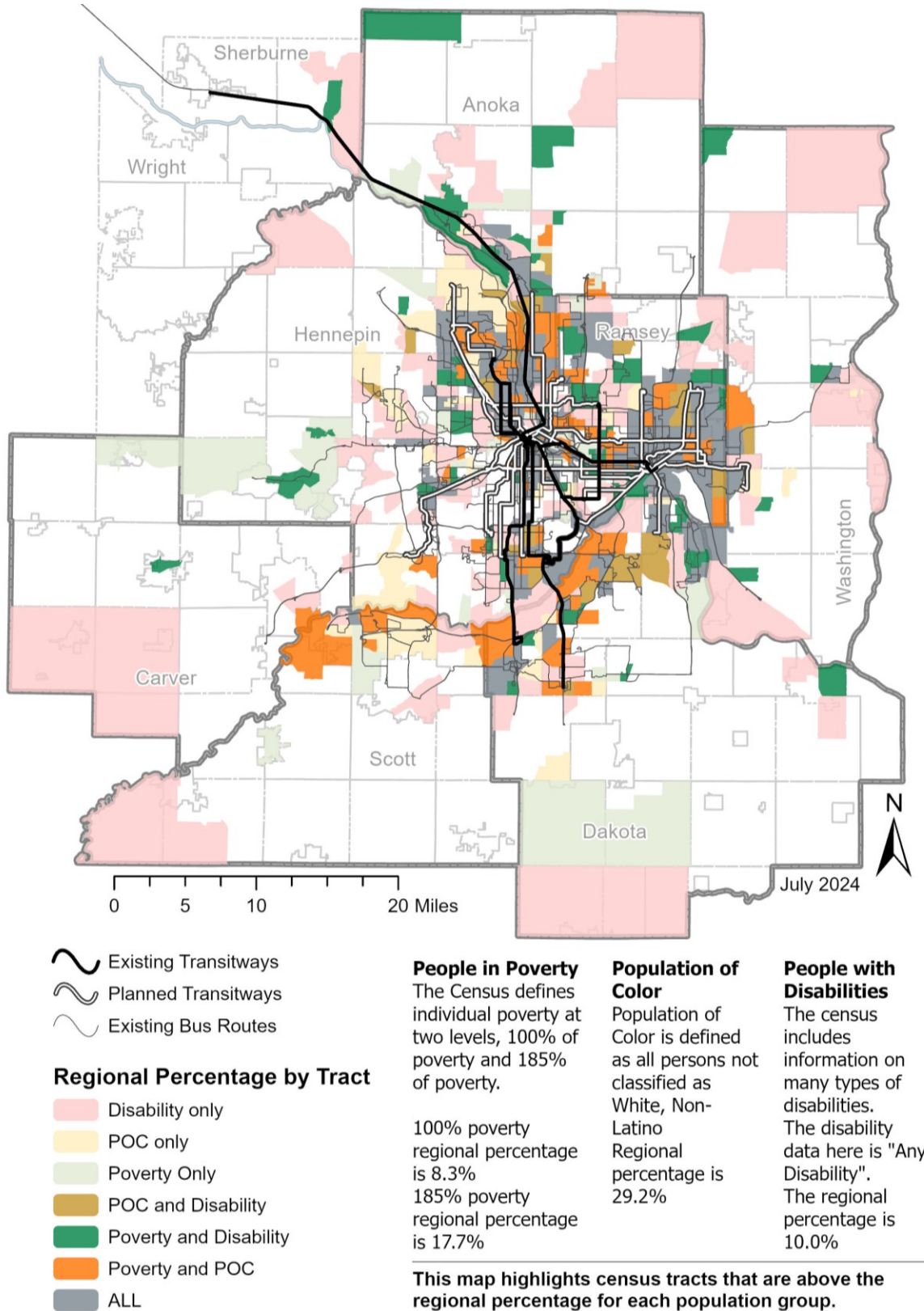
Population of Color is defined as all persons not classified as White, Non-Latino
 Regional percentage is 29.2%

People with Disabilities

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This map highlights census tracts that are above the regional percentage for each population group.

Figure 5. Population and 2050 transit investments



Quantitative Analysis of Plan Investments and Strategies

Highway and transit investments provide regional benefit, and a spatial analysis reveals a widespread application of this benefit. While benefits of highway investments extend well beyond the immediate area of a project, in some cases these projects provide little benefit to those living directly alongside those investments. Furthermore, there can be a disproportionate burden placed on communities who are collocated with highway investments. One way of capturing the benefits is through accessibility, in this case measuring cumulative access to employment within a reasonable time for the general population, for people of color, and for low-income households. To quantify benefits of the plan’s highway and transit investments, an accessibility analysis was done using the regional model for employment and other community amenities.

Highway and transit accessibility

This analysis compares the plan’s accessibility benefits for the entire region with the benefits to areas with higher percentages of people in poverty, people of color, and people with disabilities. Accessibility benefits are estimated by looking at the difference between accessibility under the 2050 Transportation Policy Plan investments (the Build scenario) and accessibility under a scenario in which no transportation investments are made after 2025 (referred to as a No Build scenario). In this case, accessibility is measured by how many jobs residents can reach on average in 30 minutes by automobile or in 45 minutes by transit. Table 1 summarizes the percent change in accessibility between these two scenarios. The table summarizes these changes for the entire region and for Census tracts with percentages above the regional average for the three population groups. These population groups are mapped in Figure 1 through 5 on the previous pages.

Table 1. Percent change in average jobs accessibility between the no build and build scenarios²

Mode	Regional	People with disabilities	People in poverty	People of color
Auto	2%	2%	1%	1%
Transit	15%	14%	14%	14%

The accessibility benefits for tracts with higher than average percentages of these three population groups closely match the regional benefits, although the percent changes are slightly lower. However, these groups of Census tracts have access to higher average overall numbers of jobs as a baseline, compared to the rest of the region. This is likely due to generally higher overall development densities and levels of transit service.

Populations in proximity to the regional highway system

In the most recent Statewide Multimodal Plan, MnDOT cited work performed by the Minnesota Pollution Control Agency (MPCA) that showed 91% of Black people, Indigenous people, and people of color in Minnesota are exposed to higher levels of air pollution than the state average. This is attributed in part to a higher portion of these communities living in proximity to MnDOT’s roadway system. For the region, the regional highway system includes highways designated as principal arterials and minor arterial roadways. Principal arterials are generally limited-access highways and freeways. Minor arterial roadways support and supplement principal arterials and provide access to jobs and education.

² U.S. Census, 2018-2022 American Community Survey 5-Year Estimates, tract level, with Metropolitan Council forecasts and University of Minnesota Accessibility Observatory data

To determine if there were more environmental justice populations in proximity to the regional highway system, these populations within a quarter mile of principal arterials (PA) and minor arterials (MA) were compared to their overall percentages of population within the region. As shown in Table 2, environmental justice populations have higher concentrations near principal arterials compared to minor arterials, and the percentages of environmental justice populations living within a quarter mile of either principal or minor arterials are higher than they are in the region’s population.

Table 2. Environmental justice populations near the regional highway system³

Population	Within ¼ of PA	Within ¼ of MA	Region
White alone	66.5%	69.4%	70.8%
Black or African American alone	10.1%	9.1%	9.8%
American Indian and Alaska Native alone	0.4%	0.4%	0.4%
Asian alone	6.5%	7.0%	7.6%
Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%
Some other race alone	0.4%	0.5%	0.5%
Two or more races	4.1%	4.1%	4.4%
Hispanic or Latino	6.6%	6.4%	6.6%

In 2022, the Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Health (MDH) released the update for their report on Life and Breath: How Air Pollution Affects Public Health in the Twin Cities. This 2022 analysis found that “the highest estimated rates of air pollution-related death and disease are found in neighborhoods with the largest percentage of Black, Indigenous, and People of Color, low-income and uninsured residents, and people who live with a disability.”⁴

³ U.S. Census, 2018-2022 American Community Survey 5-Year Estimates, Tract Level

⁴ Minnesota Pollution Control Agency, “[Health impacts of air pollution, Life and Breath: Metro](#),” 2022.

Statement of Environmental Justice Compliance

After analyzing the distribution of programs, strategies, and projects identified in the 2050 Transportation Policy Plan, and the location of historically overburdened populations in the region, it can be concluded that any benefits or adverse effects associated with implementing the plan are not distributed to these populations in a manner significantly different than to the region's population as a whole.

During the project selection and project development processes, individual programs and projects will be further evaluated for potential disproportionate and adverse effects on these population groups.

Inclusion in Regional Solicitation

In 2014, the Transportation Advisory Board and the Metropolitan Council completed an evaluation and redesign of how the region distributes federal transportation funding through its competitive process. Based on Thrive MSP 2040 and the Transportation Policy Plan, equity, including affordable housing, was included in the 2014 solicitation as part of the prioritization criteria. This criterion has continued to be used with some refinement for solicitations since, including in 2024. In November 2019, the Met Council hosted workshops for potential applicants on engaging overburdened populations. The Regional Solicitation Evaluation underway will consider any potential changes needed for the prioritization criteria for the 2026 Regional Solicitation.

Title VI Compliance

Title VI of the Civil Rights Act of 1964 provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Federal guidance on Title VI implementation requires that MPOs submit a Title VI report that includes:

- A demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate
- A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process
- Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey data, at Census tract or block group level, and charts that analyze the impacts of the distribution of state and federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient
- An analysis of impacts that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines where there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be used that would have a less discriminatory impact.

These items are included in the Metropolitan Council's [Title VI Compliance and Implementation Plan](#) from 2022.

Justice40

The Justice40 Initiative is a government-wide effort to ensure federal benefits reach communities who have the most need based on previous underinvestment and overburdening by pollution. This initiative was created by Executive Order 14008: Tackling the Climate Crisis at Home and Abroad. The goal of

this work is to ensure at least 40% of the benefits of specific federal investment programs are delivered to disadvantaged communities.

While there are many federal funding programs included in Justice40, some of the ones the region programs include the Carbon Reduction Program, the Congestion Mitigation and Air Quality Improvement Program (CMAQ), the Transportation Alternatives Surface Transportation Block Grant set-aside, and the PROTECT formula program. Discretionary programs direct from the federal government are also included, like the Safe Streets and Roads for All program and the RAISE discretionary grants.

As the US Department of Transportation releases more guidance on this initiative, work will continue to ensure the region's planning process incorporates the initiative for applicable federal funding.

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