

SOCIAL, ECONOMIC, AND ENVIRONMENTAL JUSTICE ANALYSIS REPORT

SE 4th Street BNSF Railroad Underpass (SH-37
Improvements)

From S. Broadway Avenue and S. Eastern
Avenue

Cleveland County, Oklahoma

JP 33025(04)

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1.0 INTRODUCTION

1.1 Purpose of Social, Economic, and Environmental Justice Analysis

This report presents the detailed analysis conducted to assess potential social and economic impacts associated with the proposed SE 4th Street (State Highway 37 (SH-37)) improvements project in Cleveland County, Oklahoma. This report provides a definition of Environmental Justice populations, a community profile of the geographic area anticipated to be impacted by the proposed project, a discussion of proposed right-of-way and construction easements required for the proposed project and the potential for displacements, potential changes to access and travel patterns, potential community cohesion impacts, public involvement efforts, and concludes with an analysis of whether or not Environmental Justice populations are impacted. The overarching goals of this specialist study are (1) to determine and assess the proposed project's potential effects on the community from potential displacements, changes in access and travel patterns, and impacts to community cohesion; (2) to determine whether any impacts would be adverse and whether there are any beneficial impacts associated with the proposed project; and (3) to ensure that the proposed residential and commercial displacements are documented under the National Environmental Policy Act (NEPA) and to determine if the displacements constitute disproportionate high and adverse impacts from an Environmental Justice perspective.

1.2 Project Overview

The City of Moore, in cooperation with the Federal Highway Administration (FHWA) and Oklahoma Department of Transportation (ODOT), is proposing improvements to SE 4th Street (SH-37) between S. Broadway Avenue and S. Eastern Avenue, and a portion of the Burlington Northern and Santa Fe Railway (BNSF) Railroad alignment in City of Moore in Cleveland County, Oklahoma. The purpose of this project is to improve safety and reduce delay time caused by the existing BNSF at-grade railroad crossing within the City of Moore on SE 4th Street (SH-37).

The proposed improvements include construction of a new railroad bridge consisting of two tracks with room for a future track (two-track lanes currently exist) over SE 4th Street (SH-37). The existing roadway, on SE 4th Street, is a four-lane curb and gutter section and will be reconstructed as a four-lane curb and gutter section. Retaining walls would be constructed north and south of SE 4th Street (SH-37) throughout most of the project limits along with a raised median between eastbound and westbound mainlines. Sidewalks are proposed on both sides of the grade-separated roadway, including a pedestrian bridge over the BNSF Railroad. During construction, the roadway would be closed, and traffic would be detoured. The railroad would be diverted on a shoofly during construction.

The proposed project is approximately 0.3 miles long, beginning 0.15 miles east of I-35, extending north approximately 0.3 miles. The proposed project is located on approximately 3.2 acres of existing right-of-way and includes approximately 2.0 acres of proposed right-of-way to accommodate the proposed build alternative. The total project area is approximately 5.2 acres in size.

Appendix A: Figure 1 shows the project location and the community study area.

1.3 Proposed Alternatives

No-Build Alternative

Under the No-Build Alternative for the proposed project, the existing conditions of the roadway would remain the same and the grade-separated railroad overpass would not be constructed. The purpose of improving safety and reducing delays caused by the railroad crossing would not be achieved by the No-Build Alternative.

The No-Build Alternative is carried forward throughout this document as a baseline comparison to the Build Alternative.

Build Alternative

The proposed improvement consists of the reconstruction of existing SE 4th Street (SH-37) (4-lane roadway facility) and providing a grade-separated BNSF railroad overpass in the City of Moore between S. Broadway Avenue and S. Eastern Avenue. The purpose of the project is to improve safety and reduce delay time caused by the existing BNSF at-grade railroad crossing within the City of Moore on SE 4th Street (SH-37). The road would be closed during construction, and traffic would be detoured. The railroad would be diverted on a shoofly during construction. The Build Alternative would achieve the purpose of improving safety and reducing delays.

2.0 SOCIAL AND ECONOMIC PROFILE

2.1 Definition of Environmental Justice Populations

Executive Order (EO) 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” requires each federal agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations.” FHWA has identified three fundamental principles of environmental justice:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations (FHWA 2015).

FHWA Order 6640.23A defines a minority as a person who is: Black; Hispanic or Latino; Asian American; American Indian and Alaska Native; or Native Hawaiian and Other Pacific Islander (FHWA 2012). EO 12898 defines a minority population as any readily identifiable group of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed FHWA program, policy, or activity.

Low-income is defined as a household income at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. In 2021, the HHS poverty guideline for a four-person family is \$26,500 (HHS 2021).

2.2 Community Profile

The project area is located in the City of Moore within Cleveland County. The western terminus of the project area extends to S. Broadway Avenue and the eastern terminus of the project area extends just east of S. Eastern Avenue.

The community study area is made up of Census blocks within 1,000 feet of the proposed project footprint. The community study area is largely urban, with residential, commercial, and industrial land uses interspersed throughout. A large tract of parkland is also present in the community study area. **Appendix A: Figure 1** illustrates the community study area.

Land uses in the community study area include single-family and multi-family residential, commercial, parkland, municipal, light industrial, with very few undeveloped parcels. Scattered, older single-family homes were observed north of the project area and newer suburban neighborhoods, such as the Hunter's Glen subdivision, were observed south of the project area during the April 2021 site visit. A variety of commercial properties and community facilities exist within the community study area including multiple retail establishments, churches, medical clinics, municipal facilities, day care centers, non-profit organizations, a park, and an alternative learning school. **Appendix A: Figure 2** illustrates the locations of these community facilities. Scattered sidewalks and bicycle lanes exist in the community study area but are not present along the proposed project limits.

Environmental Justice Populations in the Community Study Area

For purposes of this demographic analysis, the Census tracts, block groups, and blocks within 1,000 feet of the project footprint were assessed (**Exhibit 1**). The study areas for the minority and low-income population analyses differ due to the availability of Census data.

Three Census block groups associated with the *2015-2019 American Community Survey (ACS) 5-Year Estimates* and 23 populated Census blocks associated with the *2010 Census* are relevant to the proposed project. The three Census block groups adjacent to the proposed project comprise the study area for household income and poverty analysis. The 23 populated Census blocks within 1,000 feet of the project footprint comprise the study area for minority characteristics.

Minority Characteristics

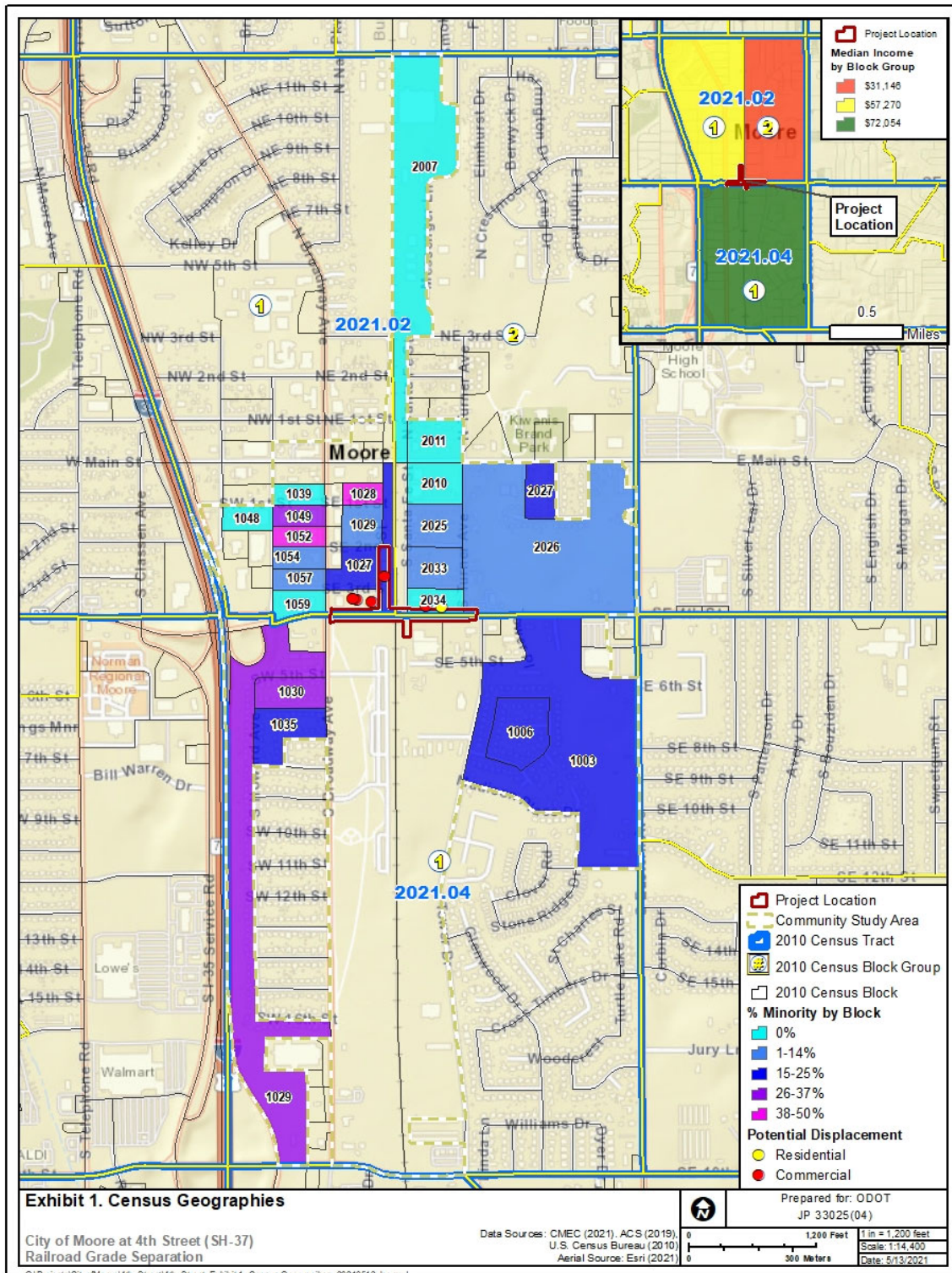
Data from the 2010 Census for the 23 populated Census blocks within 1,000 feet of the projection footprint have been used in this analysis. (Note: According to 2010 Census data, 23 of the 53 blocks within 1,000 feet of the project footprint are populated [*U.S. Census Bureau 2010*].) **Exhibit 1** shows the proportion of minority populations for each populated Census block in the minority population study area. **Appendix B** contains the percent minority population data for each populated Census block in the minority population study area. The 23 populated Census blocks have minority percentages that range from 0 to 50 percent. The largest minority population is Hispanic or Latino. However, it should be noted that two populated blocks with 50 percent minority population each contain a total population of less than 10 people.

Income Characteristics

The Census block groups adjacent to the project footprint were used for the analysis of income characteristics of the community. Three Census block groups comprise the low-income population study area for the household income and poverty analysis. **Exhibit 1** contains the median household income characteristics of the Census block groups adjacent to the project footprint.

The data illustrated in **Exhibit 1** shows the median household incomes in the past 12 months within the block groups adjacent to the proposed project range from \$31,146 to \$72,054. In 2021, HHS set the poverty guideline for a family of four at \$26,500 (HHS 2021). Based on this information, there are no predominantly low-income Census geographies adjacent to the proposed project. **Appendix B** contains the income data represented by the study area.

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3.0 SOCIAL AND ECONOMIC IMPACTS

3.1 Right-of-Way and Displacements

No-Build Alternative

Under the No-Build Alternative for the proposed project, additional right-of-way would not be required and the proposed grade-separation and retaining walls would not be built; therefore, no property acquisitions or displacements would occur.

Build Alternative

The Build Alternative would require right-of-way acquisition and grade separation of 4th Street (SH-37) along the proposed project limits. One residential relocation and five commercial relocations may be necessary due to the impact of the proposed right-of-way and access changes due to the proposed grade separation. **Figure 2 in Appendix A** illustrates the locations of the potential displacements.

Displacements

For the purpose of this assessment, potential displacements were identified by City of in the Residential Relocation Supplement dated September 29, 2020 and in the Relocation Status Report dated February 1, 2021 (City of Moore 2020). If a residential or commercial property is occupied when the proposed project begins, full relocation benefits and relocation advisory assistance will be offered to all affected displaced persons.

One residential relocation and five commercial relocations may be necessary due to the impact of the proposed right-of-way and access changes due to the proposed grade separation. **Table 1** provides details about the potential residential displacement and **Table 2** provides details about the potential commercial displacements.

The sites identified as potential residential and commercial displacements are listed below in **Tables 1 and 2** and illustrated on **Figure 2 in Appendix A**. An extensive search was conducted for comparable homes for sale in the area surrounding the proposed project for the Residential Relocation Supplement. The Residential Relocation Supplement found that “there is a lack of comparable replacement housing available within the project area.” Thus, the document concluded that the payment necessary for the displacement would exceed the statutory limit amount in order for the displacees to afford a home that is “superior than the displacement home,” also classified as “Housing of Last Resort.” For more details on replacement housing, see the Relocation Supplement (City of Moore 2020).

Table 1: Potential Residential Displacement

Location ID	Parcel ID	Physical Address	Structure Description	Figure 2 Sheet Reference
R6	No. 9.	225 SE 4th Street Moore, OK 73160	2,645 square-foot brick home (Cleveland County CAD ID #4743)	2a/2b

Table 2: Potential Commercial Displacements

Location ID	Parcel ID	Business Name/ Physical Address	Structure Description	Estimated Number of Employees	Type of Business	Existing Land Use	Figure 2 Sheet Reference
R1	No. 2, 2.1	<i>J. R.'s BBQ Supply Company, LLC</i> 123 SE 4th Street Suite E, Moore, OK, 73160	11,620 square-foot retail store with two active tenants (Cleveland County CAD ID #4749)	2-4*	Retail	Commercial	2a/2b
R2	No. 2, 2.	<i>Nightmare Vapes</i> 123 SE 4th Street Suite G, Moore, OK, 73160		2-4*	Retail	Commercial	2a/2b
R3	No. 4, 4.1	<i>Randall's Temperature Control</i> 131 SE 4th Street, Moore, OK, 73160	4,560 square-foot light- industrial manufacturing building (Cleveland County CAD ID #4747)	6	HVAC Services	Commercial	2a/2b
R4	No. 5	<i>Tillison Cabinet Shop</i> 137 SE 4th Street, Moore, OK, 73160	22,245 square-foot light- industrial manufacturing building (Cleveland County CAD ID #4304)	28	Retail	Commercial	2a/2b
R5	No. 8.1	<i>Donna's Razor Cuts</i> 209 SE 3rd St. Moore, OK, 73160	960 square-foot barber/beauty shop (Cleveland County CAD ID #102950)	1	Retail	Commercial	2a/2b

*Estimated number of employees is based on like businesses and could not be verified for this business by manta.com (May 2021).

The five potential commercial displacements are composed of a strip mall with two active commercial tenants (R1 and R2), an air conditioning contractor business (R3), a cabinet shop (R4), and a salon/barber shop (R5). One commercial displacement would occur due to the proposed right-of-way impacting the commercial structure (R4). The remaining four displacements would occur due to the proposed grade separation eliminating access to the businesses. However, R3 has the potential to remain in place as the City of Moore is currently working with the property owner to provide alternative access to this facility. None of the five potential commercial displacements appear to serve a specific population (e.g. racial/ethnic groups or low-income families). Employment impact estimations listed below are based on best available data from Manta.com.

The first active commercial business requiring potential relocation and re-establishment is J. R.'s BBQ Supply Company, LLC (R1), located at 123 SE 4th Street Suite E, Moore, OK, 73160. This business would be impacted by the proposed grade separation and the construction of the retaining wall which would eliminate access to the driveway and parking lot (see R1 in **Figure 2a and 2b**). This commercial business is identified as a retail BBQ supply store. The business is not unique to the area as there are several big-box retail stores selling BBQ supplies and grills located in the City of Moore, less than five miles away. Although the building would not be directly impacted by the proposed project, the proposed grade separation and construction of a retaining wall would prevent access to/from the strip mall and all the commercial tenants located within. The potential change in access is anticipated to cause the business to cease operations at the current location. As of 1/27/2021, the City of Moore is working on pre-approval of reestablishment for this business with the property owner. For more details on commercial relocations, see the Relocation Status Report (City of Moore 2021). If J. R.'s BBQ Supply Company, LLC does not relocate in the area, approximately two to four jobs would be lost. Comparable job opportunities for the affected employees may be available in the City of Moore. According to online job search sites, there are currently multiple sales associate positions open for applications in Moore, Oklahoma (Indeed 2021).

The second active commercial business requiring potential relocation and re-establishment is Nightmare Vapes (R2), located at 123 SE 4th Street Suite G, Moore, OK, 73160. This business would be impacted by the proposed grade separation and the construction of the retaining wall which would eliminate access to the driveway and parking lot (see R2 on **Figure 2a and 2b**). This commercial business is identified as a retail vape store. The business is not unique to the area as there are several vape tobacco shops less than five miles away. Although the building would not be directly impacted by the proposed project, the proposed grade separation and construction of a retaining wall would prevent access to/from the strip mall and all the commercial tenants located within. The potential change in access is anticipated to cause the business to cease operations at the current location. As of 1/27/2021, the City of Moore is working on pre-approval of reestablishment for this business with the property owner. For more details on commercial relocations, see the Relocation Status Report (City of Moore 2021). If Nightmare Vapes, LLC does not relocate in the area, approximately two to four jobs would be lost. Comparable job opportunities for the affected employees may be available in the City of Moore. According to online job search sites, there are currently multiple sales associate positions open for applications in Moore, Oklahoma (Indeed 2021).

The third active commercial business requiring potential relocation and re-establishment is Randall's Temperature Control (R3), located at 131 SE 4th Street, Moore, OK, 73160. This business would be impacted by the proposed grade separation and the construction of the retaining wall which would

eliminate access to the driveway and parking lot (see R3 on **Figure 2a and 2b**). This commercial business is identified as an air conditioning contractor. The business is not unique to the area as there are several air conditioning contractors less than five miles away. Although the building would not be directly impacted by the proposed project, the proposed grade separation and construction of a retaining wall would prevent access to/from the commercial business. The potential change in access is anticipated to cause the business to cease operations at the current location. However, according to the Relocation Status Report, the City of Moore is currently working with the property owner to provide alternative access to the business and avoid a relocation, although an alternative access route currently has not been obtained. If access to Randall's Temperature Control is not achievable, and the business does not relocate in the area, approximately six jobs would be lost. Comparable job opportunities for the affected employees may be available in the City of Moore. According to online job search sites, there are currently multiple air conditioning technician and sales positions open for applications in Moore, Oklahoma (Indeed 2021).

The fourth active commercial business requiring potential relocation and re-establishment is Tillison Cabinet Shop (R4), located at 137 SE 4th Street, Moore, OK, 73160. This commercial structure is located parallel to the BNSF Railroad and within the proposed right-of-way for the project (see R4 on **Figure 2a and 2b**). This commercial business is identified as cabinet shop. The business is not unique to the area as there are several cabinet makers less than five miles away. The structure would be directly impacted by the proposed project, and in addition, the proposed grade separation and construction of a retaining wall would prevent access to/from the business. The potential right-of-way impact and change in access is anticipated to cause the business to cease operations at the current location. As of 1/22/21, the City of Moore has secured the parcel and is continuing to work with the property owner. For more details on commercial relocations, see the Relocation Status Report (City of Moore 2021). If Tillison Cabinet Shop does not relocate in the area, approximately 28 jobs would be lost. Comparable job opportunities for the affected employees may be available in the City of Moore. According to online job search sites, there are currently multiple cabinet maker and sales positions open for applications in Moore, Oklahoma (Indeed 2021).

The fifth and final active commercial business requiring potential relocation and re-establishment is Donna's Razor Cuts (R5), located at 209 SE 3rd Street, Moore, OK, 73160. This business would be impacted by the proposed grade separation and the construction of the retaining wall which would eliminate access to the driveway and parking lot (see R5 on **Figure 2a and 2b**). This commercial business is identified as a retail barber shop. The business is not unique to the area as there are several barber shops less than five miles away. The potential displacement is anticipated to cause the business to cease operations at the current location. As of 12/20/2020, the City of Moore has submitted the acquisition file to condemnation, and no additional relocation activities have taken place. For more details on commercial relocations, see the Relocation Status Report (City of Moore 2021). If Donna's Razor Cuts does not relocate in the area, approximately one job would be lost. Comparable job opportunities for the affected employees may be available in the City of Moore. According to online job search sites, there are currently barber/stylist positions open for applications in Moore, Oklahoma (Indeed 2021).

The approximate total number of employees affected by the potential displacements of active commercial businesses ranges from 39 to 43. This equates to approximately less than one percent of the local civilian labor force of employed persons aged 16 years and older for the City of Moore (U.S. Census Bureau 2019). Currently, the unemployment rate for the City of Moore is approximately 4.4

percent, which roughly equates to the county average for Cleveland County (4.3 percent) and is less than the state average (5.1 percent) (U.S. Census Bureau 2019).

If the businesses relocate within the community, there would be no permanent loss to the property tax base, no permanent loss of employment, and no permanent inconvenience to local patrons and customers of the establishments. In addition, there could be a temporary economic benefit to the extent that construction materials and labor are captured locally. If the businesses cannot relocate within the community, the local property tax base would be reduced, approximately 1 to 28 jobs would be lost, and local patrons of the businesses would have to travel to the closest similar business less than five miles away.

Implementation of the proposed project may require the relocation and adjustment of utilities such as water lines, sewer lines, gas lines, telephone cables, electrical lines, and other subterranean and aerial utilities. The relocation and adjustment of any utilities would be coordinated with the affected utility provider to ensure that no substantial interruption of service would take place.

The City of Moore would be responsible for the right-of-way acquisition. Acquisition and relocation assistance would be consistent with the U.S. Department of Transportation (USDOT) policy, as mandated by the Uniform Relocation Assistance and Real Properties Acquisitions Act (URARPA), as amended in 1987 (49 Code of Federal Regulations [CFR] 24.205 Relocation Planning, Advisory Services, and Coordination). Just compensation is based upon fair market value of the property.

None of the potential displacements that would result from the proposed project are located within Census block groups containing predominantly low-income populations. One of the six potential displacements that would result from the proposed project is located within Census blocks containing a minority population (R3 – *Block 1027, Block Group 1, Census Tract 2021.02*).

3.2 Access and Travel Patterns

No-Build Alternative

Under the No-Build Alternative for the proposed project, the existing conditions the roadway would remain the same and the safety and mobility improvements would not be made.

Build Alternative

Under the Build Alternative, it is anticipated that access to some adjacent residential and commercial properties would be lost, while travel patterns and mobility to other residential, commercial, and municipal areas would be improved. The Build Alternative was developed to improve safety and reduce delay time caused by the existing BNSF at-grade railroad crossing within the City of Moore on SE 4th Street (SH-37).

Changes in travel patterns are anticipated due to the construction of a grade-separated underpass beneath the BNSF railroad overpass between S. Broadway Avenue and S. Eastern Avenue along SE 4th Street (SH-37). There are several businesses and one community facility located along the corridor between S. Broadway Street and S. Eastern Avenue that would have access restrictions; however, the City of Moore is working with property owners to provide alternative access to the businesses and community facilities to avoid potential adverse changes in access. The properties currently in coordination with the City of Moore include: Sharky's Scuba, Vista Academy Schools, Cavnar State Farm Insurance Agency Inc. The remaining properties with access restrictions where the City is unable to

provide access have been identified as displacements by the City of Moore and identified in the Relocation Status Report and Relocation Supplement (City of Moore 2020, 2021). The potential changes in access and travel patterns could result in slightly longer travel times for residents, employees, or commercial customers along SE 4th Street (SH-37) where a grade separation and retaining wall is proposed; however, shorter travel times are expected for the majority of properties in the area due to grade-separated underpass and reduced delay. Additionally, the proposed addition of the pedestrian bridge over the BNSF Railroad and continuous 10-foot-wide shared-use paths in each direction along SE 4th Street (SH-37) would promote connectivity and improve mobility for pedestrians and cyclists along the corridor.

Overall, these improvements offer safety and mobility benefits for the majority of residents and would not significantly adversely affect the frequency with which people access other parts of the community.

3.3 Community Cohesion

Community cohesion is a term that refers to an aggregate quality of a residential area. Cohesion is a social attribute that indicates a sense of community, common responsibility, and social interaction within a limited geographic area. It is the degree to which residents have a sense of belonging to their neighborhood or community or a strong attachment to neighbors, groups, and institutions as a continual association over time.

No-Build Alternative

Under the No-Build Alternative for the proposed project, a change in community cohesion is not anticipated.

Build Alternative

The existing community in the area traversed by the Build Alternative can be characterized as an urban community with residential, commercial, open space, municipal, and light-industrial land use. SE 4th Street (SH-37) is an existing transportation corridor, and the roadway and adjacent BNSF railroad are present barriers between existing residential, commercial, and community facilities located in the project area. While the proposed grade separation may contribute to a potential perceived sense of separation between the communities located on either side of the proposed project, the proposed pedestrian bridge and shared use paths would improve connectivity for pedestrians throughout the project area. The proposed railroad bridge over SE 4th Street is necessary to improve safety and reduce delay time caused by the existing BNSF at-grade railroad crossing. Additionally, the proposed addition of the pedestrian bridge over the BNSF Railroad and continuous 10-foot shared-use paths in each direction would promote connectivity and improve mobility for pedestrians and cyclists along the corridor.

The proposed improvements would not affect, separate, or isolate any distinct neighborhoods, ethnic groups, or other specific groups because SE 4th Street (SH-37) is an existing roadway. No impacts to community cohesion are anticipated. ODOT has and will continue to facilitate communication with the general public, adjacent property owners, business owners, residents, and other public agencies with interests along SE 4th Street (SH-37).

4.0 PUBLIC INVOLVEMENT

4.1 Limited English Proficiency (LEP)

The U.S. Department of Transportation (USDOT) has issued guidance outlining four factors to assess language needs and decide what reasonable steps should be taken to ensure meaningful access for Limited English Proficiency (LEP) persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.
 2. The frequency with which LEP individuals come in contact with the program.
 3. The nature and importance of the activity or service provided by the program to people's lives.
 4. The resources available to the grantee/recipient or agency, and costs.
- (USDOT 2016)

An analysis was conducted to identify LEP populations in the project area. LEP populations were identified using block group level data from the *2015-2019 ACS 5-Year Estimates*. Census block groups adjacent to the proposed project limits were assessed. Within the population that is five years of age and older, persons who speak English less than "very well" are considered to have LEP.

LEP populations in the individual Census block groups adjacent to the community study area range from approximately 0.8 to 2.7 percent of the total population five years of age and older. Of the 4,492 people (five years and older) within all three Census block groups, approximately 1.4 percent speaks English less than "very well." The most prevalent languages spoken by the 63 people with LEP are Spanish (52 people), followed by Asian and Pacific Islander languages (11 people). **Appendix B** contains the LEP data represented by the study area.

Based on this data, additional public outreach and/or translations for languages other than English was determined not to be warranted; as reflected in current census data, the LEP percentage for the project area is very low (less than two percent). However, LEP persons are given the opportunity for meaningful involvement in the NEPA process through the potential to request translation services.

4.2 Public Outreach

A public meeting was held on January 26, 2017. Agency solicitation letters were mailed on January 9, 2017. Notice of the public meeting were also sent to elected officials (federal and state), Federal Highway Administration, Oklahoma Department of Transportation Agencies, Oklahoma Transportation Commissioner, Association of Central Governments (ACOG), Cleveland County Commissioners and Public Safety, the City of Moore, local school districts, emergency service providers, post offices and medical facilities in the project area. The letter provided a brief description of the purpose and need for the project, the project history, and an invitation to the public meeting. The letter was accompanied by a project location map. A total of 43 agency solicitation letters were mailed on January 9, 2017.

Notice of the public meeting was also sent by letter to all property owners in the study area. A total of 25 letters were mailed on January 9, 2017, and 14 tenants were also notified of the meeting by letter January 9, 2017. The notice for the public meeting is contained in the Supplemental Information attachment. All notices were printed in English due to the low percentage of LEP populations in the community study area.

A total of 99 people signed in for the meeting, and the citizen comments documented at the public meeting were focused on a variety of issues, although specific design questions were most prevalent.

Public comments were accepted through February 9, 2017. A total of 19 written comments from the public were received and the general sentiment of the public expressed support for the underpass but concern for the businesses and associated access issues. **Appendix B** contains a copy of the Public Meeting Notifications.

There is no additional public involvement planned. Reasonable steps have been taken to ensure that all persons have meaningful access to the programs, services, and information provided by the City of Moore. As described above, notices were mailed to adjacent property owners and relevant agencies for initial coordination. Any public involvement information has and will continue to be made available in English, and a translator (for other languages or other special communication needs) can be provided upon request.

5.0 IMPACTS ON THE ENVIRONMENTAL JUSTICE POPULATION

No-Build Alternative

Implementation of the No-Build Alternative would not have disproportionately high and adverse human health or environmental effects on minority and/or low-income populations. However, under the No-Build Alternative for the proposed project, the existing conditions of the roadway would remain the same, the improvement would not be implemented, and the community would not benefit from the increased safety and mobility associated with the proposed project.

Build Alternative

The proposed project would improve safety and reduce delay time caused by the existing BNSF at-grade railroad crossing within the City of Moore on SE 4th Street (SH-37). Additionally, the proposed addition of the pedestrian bridge over the BNSF Railroad and continuous 10-foot-wide shared-use paths in each direction would promote connectivity and improve mobility for pedestrians and cyclists along the corridor. Environmental Justice and non-Environmental Justice communities would equally benefit from the proposed project.

The negative impacts associated with the potential residential and commercial displacements are located within Census blocks containing minority and non-minority populations. One of the six displacements (R3) would occur in a Census block containing a minority population (*Block 1027, Block Group 1, Census Tract 2021.02 – 25 percent minority*); however, the proportion of minority population in this block is similar to the city and county averages (approximately 25.4 percent and 24.3 percent minority persons, respectively). No other displacements would occur in a block containing a minority population and no displacements are located within a block group containing a predominantly low-income population. In the community study area 2 of the 23 populated census blocks include minority populations, and only one commercial displacement of the six potential residential and commercial displacements occur in a Census block containing a minority. Other impacts from the proposed project occur equally across all census geographies.

As previously discussed, it is anticipated that travel to adjacent residential, commercial, and municipal areas would be improved. The Build Alternative was developed to address the key concerns associated with the existing roadway and railroad crossing. Traffic operations along SE 4th Street (SH-37) would be enhanced because the proposed improvements would increase safety and provide a transportation

facility that accommodates safe and efficient travel and reduces delays associated with the railroad.

The proposed project would benefit residents currently traveling to and from community facilities, businesses, and residences in the community study area.

The permanent detriments to access associated with the project would affect a small number of the residential and commercial properties in the community study area. Travel patterns would be enhanced for the majority of properties in the community study area. No existing neighborhoods would be divided, and permanent, significant disruptions to normal daily activities are not expected. Surrounding communities would benefit equally from increased safety and mobility along SE 4th Street (SH-37). Based on the analysis above, the Build Alternative would not cause disproportionately high and adverse effects on any minority or low-income populations in accordance with the provisions of E.O. 12898 and FHWA Order 6640.23. No further Environmental Justice analysis is required.

6.0 REFERENCES

City of Moore. *Residential Relocation Supplement*. September 29, 2020.

City of Moore. *Relocation Status Report*. February 9, 2021.

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Appendix A: Figures

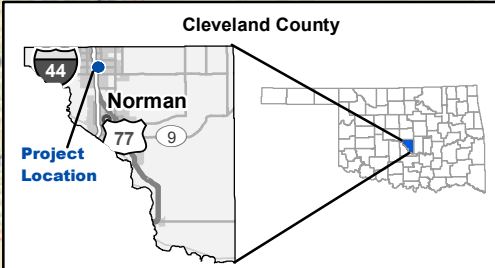
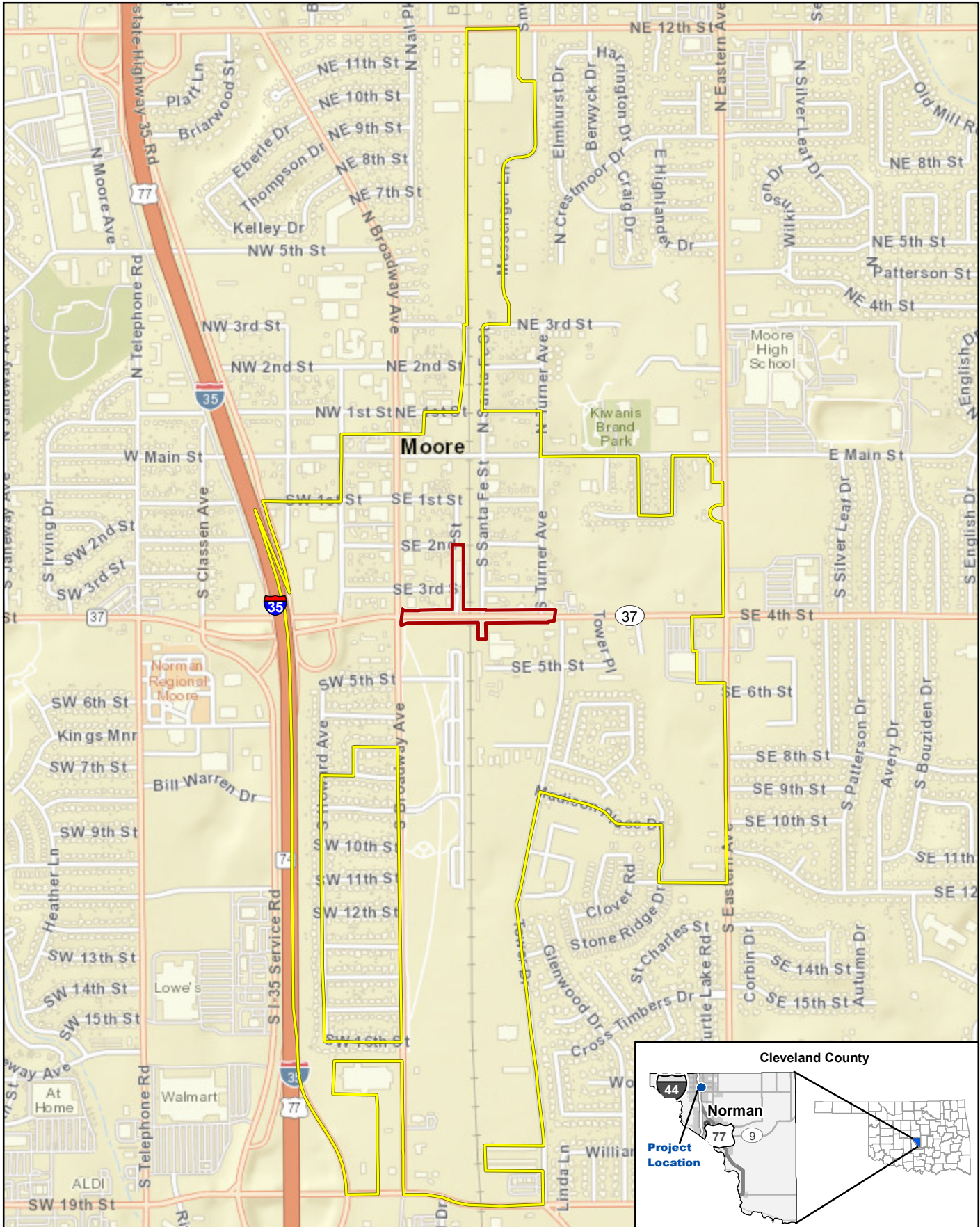


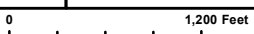
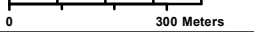


Figure 1. Project Location and the Community Study Area
 City of Moore at 4th Street (SH-37)
 Railroad Grade Separation

 Project Location
 Community Study Area
 Data Sources: CMEC (2021)
 Basemap Source: Esri (2021)

 Prepared for: ODOT
 JP 33025(04)
 1,200 Feet
 300 Meters
 1 in = 1,200 feet
 Scale: 1:14,400
 Date: 5/12/2021

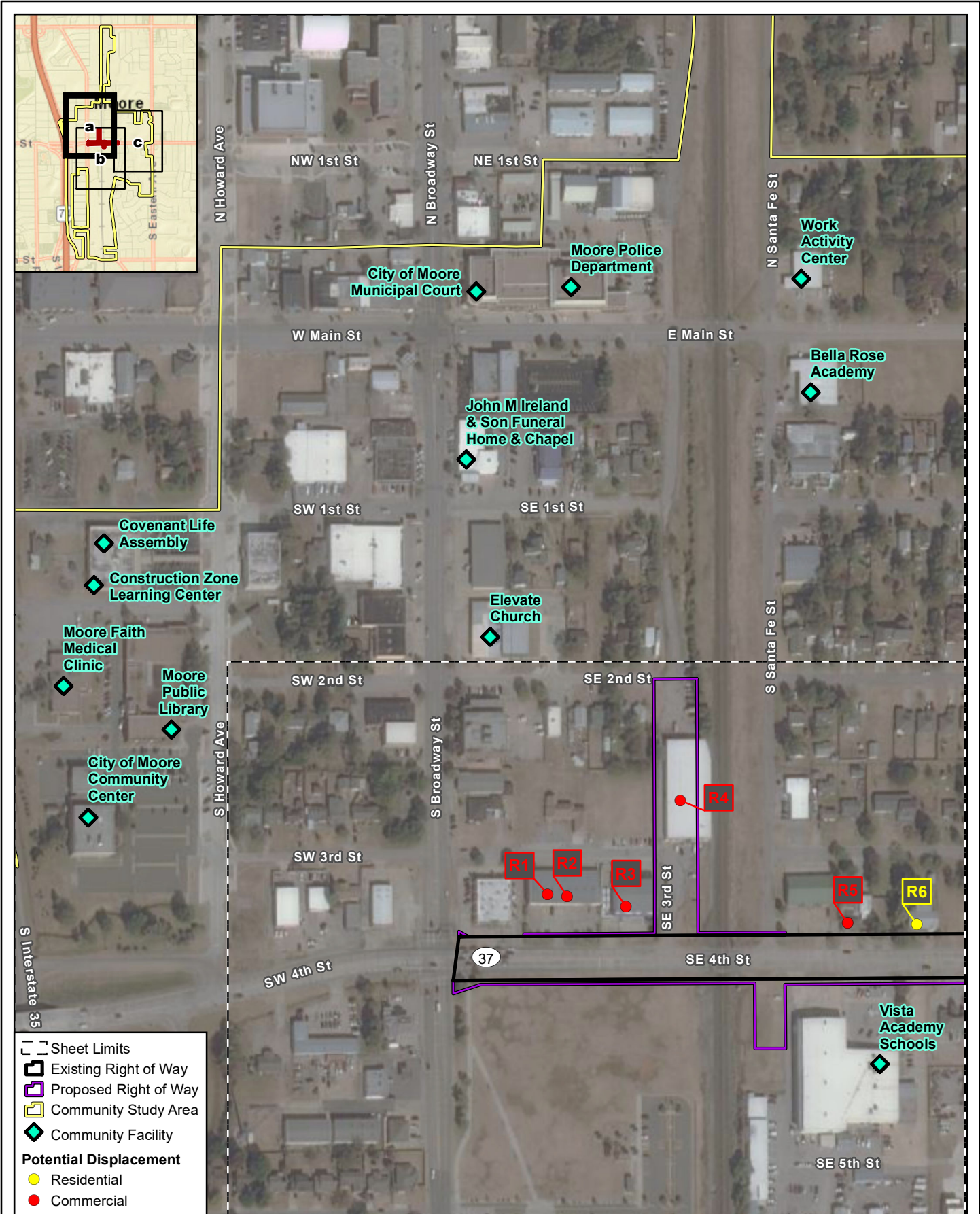
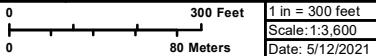


Figure 2a. Potential Displacements and Community Facilities

City of Moore at 4th Street (SH-37)
 Railroad Grade Separation



Prepared for: ODOT
 JP 33025(04)



Data Sources: CMEC (2021)
 Aerial Source: Maxar (2019)

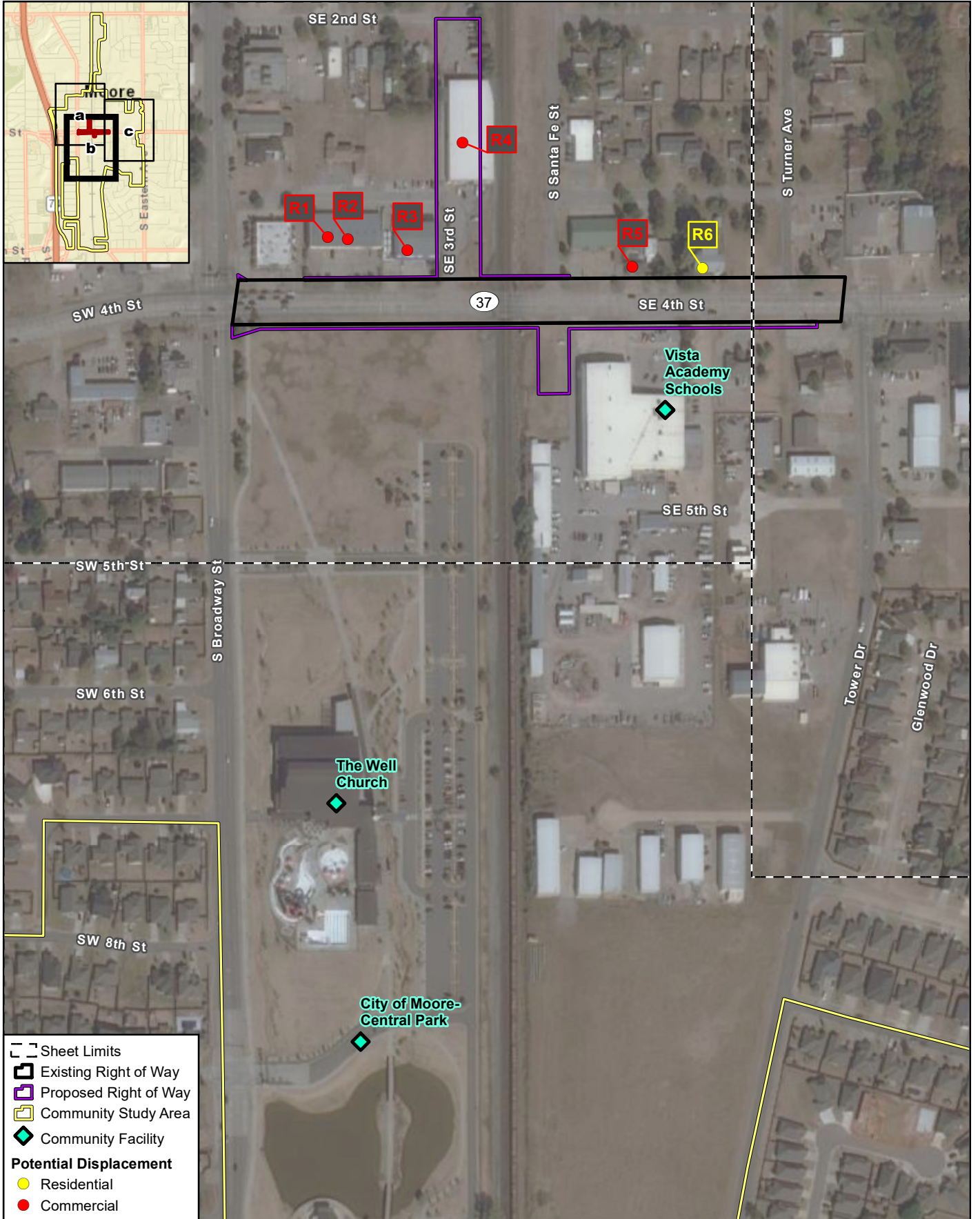


Figure 2b. Potential Displacements and Community Facilities
 City of Moore at 4th Street (SH-37)
 Railroad Grade Separation

Data Sources: CMEC (2021)
 Aerial Source: Maxar (2019)

	Prepared for: ODOT	
	JP 33025(04)	
0	300 Feet	1 in = 300 feet
0	80 Meters	Scale: 1:3,600
		Date: 5/12/2021

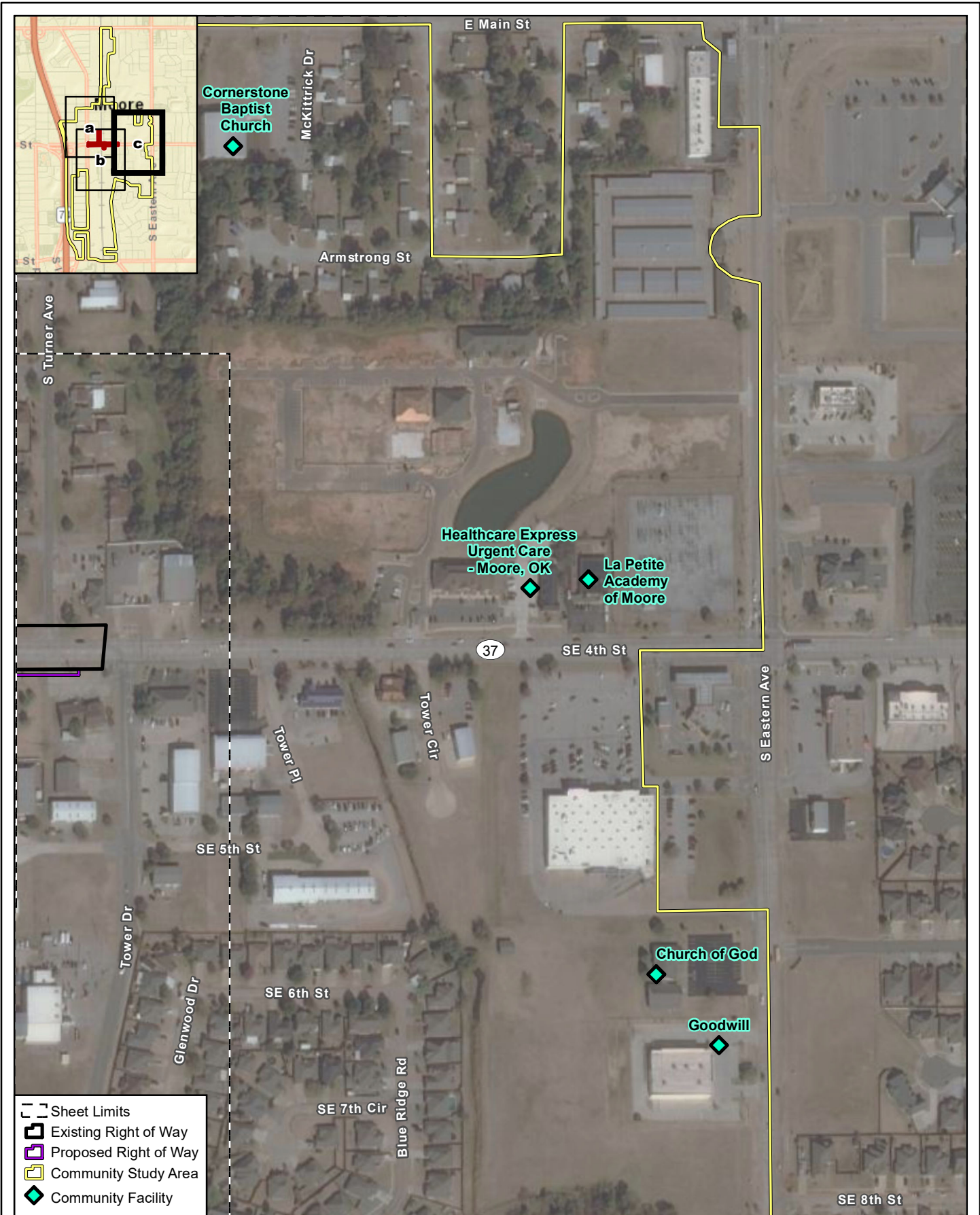


Figure 2c. Potential Displacements and Community Facilities
 City of Moore at 4th Street (SH-37)
 Railroad Grade Separation

- Sheet Limits
- Existing Right of Way
- Proposed Right of Way
- Community Study Area
- Community Facility

Data Sources: CMEC (2021)
 Aerial Source: Maxar (2019)

 0 300 Feet 0 80 Meters	Prepared for: ODOT JP 33025(04)	1 in = 300 feet Scale: 1:3,600 Date: 5/12/2021

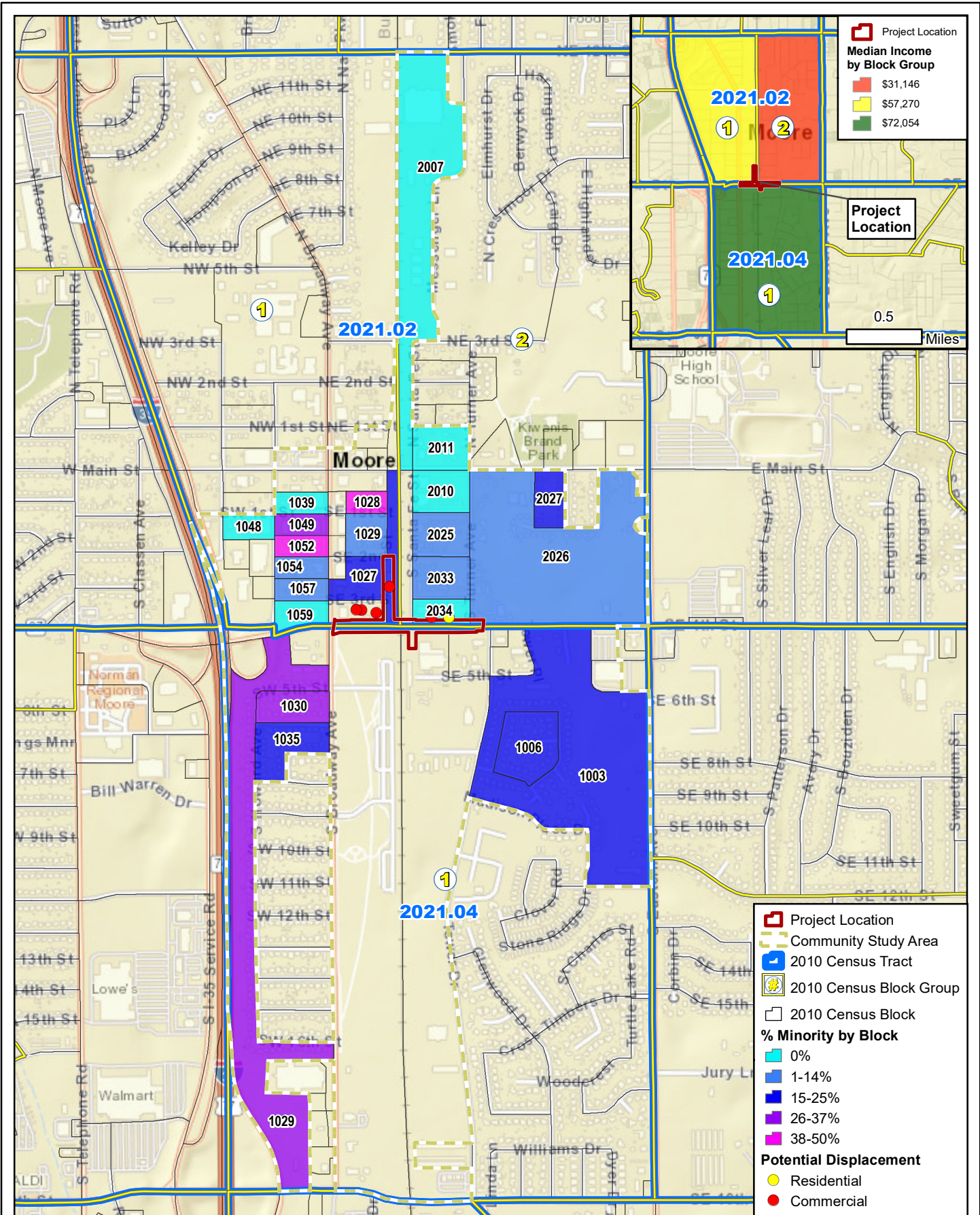


Figure 3. Census Geographies

City of Moore at 4th Street (SH-37)
Railroad Grade Separation

Data Sources: CMEC (2021), ACS (2019),
U.S. Census Bureau (2010)
Aerial Source: Esri (2021)

Prepared for: ODOT
JP 33025(04)

1 in = 1,200 feet
Scale: 1:14,400
Date: 5/13/2021

0 1,200 Feet 300 Meters

Appendix B: Supplemental Data

Table 1: Racial and Ethnic Distribution

Census Geography		Race and Ethnicity																		
Census Tract / Block Group	Block	Total Pop.	Not Hispanic or Latino														Hispanic**		Total Minority	
			White		Black*		American Indian*		Asian		Pacific Islander*		Other*		Two*		#	%	#	%
			#	%	#	%	#	%	#	%	#	%	#	%	#	%				
Cleveland County		255,755	193,549	75.7%	10,572	4.1%	11,375	4.4%	9,626	3.8%	166	0.1%	259	0.1%	12,316	4.8%	17,892	7.0%	62,206	24.3%
City of Moore		55,081	41,077	74.6%	2,430	4.4%	2,284	4.1%	1,234	2.2%	35	0.1%	49	0.1%	3,072	5.6%	4,900	8.9%	14,004	25.4%
2021.02/1		1,073	858	80.0%	15	1.4%	53	4.9%	8	0.7%	-	-	-	-	53	4.9%	86	8.0%	215	20.0%
	1027	8	6	75.0%	-	-	-	-	-	-	-	-	-	-	-	-	2	25.0%	2	25.0%
	1028	6	3	50.0%	-	-	3	50.0%	-	-	-	-	-	-	-	-	-	-	3	50.0%
	1029	14	12	85.7%	-	-	-	-	-	-	-	-	-	-	2	14.3%	-	-	2	14.3%
	1039	2	2	100.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	1048	3	3	100.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	1049	8	5	62.5%	-	-	-	-	-	-	-	-	-	-	-	-	3	37.5%	3	37.5%
	1052	6	3	50.0%	-	-	1	16.7%	2	33.3%	-	-	-	-	-	-	-	-	3	50.0%
	1054	8	7	87.5%	-	-	1	12.5%	-	-	-	-	-	-	-	-	-	-	1	12.5%
	1057	20	19	95.0%	-	-	-	-	-	-	-	-	-	-	-	-	1	5.0%	1	5.0%

Census Geography		Race and Ethnicity																		
Census Tract / Block Group	Block	Total Pop.	Not Hispanic or Latino														Hispanic**		Total Minority	
			White		Black*		American Indian*		Asian		Pacific Islander*		Other*		Two*		#	%	#	%
			#	%	#	%	#	%	#	%	#	%	#	%	#	%				
	1059	6	6	100.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021.02/2		1,381	1,115	80.7%	60	4.3%	45	3.3%	17	1.2%	1	0.1%	-	-	53	3.8%	90	6.5%	266	19.3%
	2007	4	4	100.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	2010	11	11	100.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	2011	25	25	100.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	2025	42	39	92.9%	-	-	-	-	-	-	-	-	-	-	-	-	3	7.1%	3	7.1%
	2026	63	54	85.7%	-	-	5	7.9%	-	-	-	-	-	-	-	-	4	6.3%	9	14.3%
	2027	39	32	82.1%	-	-	7	17.9%	-	-	-	-	-	-	-	-	-	-	7	17.9%
	2033	31	30	96.8%	-	-	1	3.2%	-	-	-	-	-	-	-	-	-	-	1	3.2%
	2034	6	6	100.0%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2021.04/1		2,338	1,822	77.9%	64	2.7%	107	4.6%	31	1.3%	-	-	-	-	144	6.2%	170	7.3%	516	22.1%
	1003	184	148	80.4%	-	-	2	1.1%	4	2.2%	-	-	-	-	6	3.3%	24	13.0%	36	19.6%
	1006	87	68	78.2%	4	4.6%	5	5.7%	8	9.2%	-	-	-	-	-	-	2	2.3%	19	21.8%

Census Geography		Race and Ethnicity																		
Census Tract / Block Group	Block	Total Pop.	Not Hispanic or Latino														Hispanic**		Total Minority	
			White		Black*		American Indian*		Asian		Pacific Islander*		Other*		Two*		#	%	#	%
			#	%	#	%	#	%	#	%	#	%	#	%	#	%				
	1029	185	124	67.0%	5	2.7%	11	5.9%	2	1.1%	-	-	-	-	23	12.4%	20	10.8%	61	33.0%
	1030	70	46	65.7%	-	-	5	7.1%	2	2.9%	-	-	-	-	5	7.1%	12	17.1%	24	34.3%
	1035	61	46	75.4%	-	-	3	4.9%	-	-	-	-	-	-	9	14.8%	3	4.9%	15	24.6%
Total Blocks		889	699	78.6%	9	1.0%	44	4.9%	18	2.0%	-	-	-	-	45	5.1%	74	8.3%	190	21.4%

Note: Unpopulated census blocks are not included in this table. Of the 53 total blocks that are adjacent to the project area, 23 are populated.

Source: U.S. Census Bureau 2010 Census Summary File 1—Oklahoma [machine-readable data files]/prepared by the U.S. Census Bureau, 2011. Table P9.

*The Complete Census race descriptions are as follows: White alone; Black or African American alone; American Indian and Alaska Native alone; Asian alone; Native Hawaiian and Other Pacific Islander alone; Some Other Race alone; and Two or More Races.

**See 2010 Census Summary File 1 Technical Documentation for additional information about race and origin here: <http://www.census.gov/prod/cen2010/doc/sf1.pdf>.

Table 2: Median Household Income

Census Geography	Total Households*	Median Household Income in the Past 12 Months (in 2019 inflation-adjusted dollars)†	2021 DHHS Poverty Guideline (family of four)
Cleveland County	106,172	\$64,016	\$26,500
City of Moore	23,290	\$65,915	
Census Tract 2021.02	1,137	\$36,484	
Block Group 1	457	\$57,270	
Block Group 2	680	\$31,146	
Census Tract 2021.04	839	\$72,054	
Block Group 1	839	\$72,054	

*Source: U.S. Census Bureau 2020, ACS 2015-2019 5-Year Estimates, Table B11001.

†Source: U.S. Census Bureau 2020, ACS 2015 -2019 5-Year Estimates, Table B19013.

Note: ACS data are estimates; they are not counts. Income data is provided in 2019 inflation adjusted dollars.

Table 3: Persons Who Speak English Less Than Very Well (American Community Survey 2015-2019)

Census Geography	Population 5 years & over	No. LEP	Total Percent LEP of Pop. 5 years & over	Languages Spoken by LEP Populations							
				No. Spanish	Percent Spanish of LEP Pop.	No. Indo-European	Percent Indo-European of LEP Pop.	No. Asian & Pacific Islander	Percent Asian & Pacific Islander of LEP Pop.	No. Other	Percent Other of LEP Pop.
Cleveland County	264,087	8,007	3.0%	3,417	42.7%	620	7.7%	3,747	46.8%	223	2.8%
City of Moore	56,749	1,050	1.9%	522	49.7%	23	2.2%	455	43.3%	50	4.8%
Census Tract 2021.02	2,441	46	1.9%	46	100.0%	-	-	-	-	-	-
Block Group 1	1,128	31	2.7%	31	100.0%	-	-	-	-	-	-
Block Group 2	1,313	15	1.1%	15	100.0%	-	-	-	-	-	-
Census Tract 2021.04	2,051	17	0.8%	6	35.3%	-	-	11	64.7%	-	-
Block Group 1	2,051	17	0.8%	6	35.3%	-	-	11	64.7%	-	-
Total Block Groups	4,492	63	1.4%	52	82.5%	-	-	11	17.5%	-	-

*Source: U.S. Census Bureau 2021, ACS 2015-2019 5-Year Estimates, Table B16004.

Note: ACS data are estimates; they are not counts.

Appendix C: Public Meeting Notifications



January 09, 2017

[Redacted]

RE: Solicitation for bridge improvements in the City of Moore on 4th Street for BNSF railroad underpass between S. Broadway Avenue and S. Eastern Avenue, Cleveland County; Job Piece Number 33025(04).

[Redacted]

The City of Moore, in cooperation with the Federal Highway Administration (FHWA), is proposing a railroad bridge underpass on S.E. 4th Street (SH-37) for the BNSF Railway (BNSF). The project is described as the reconstruction of existing S.E. 4th Street (SH-37) (4-lane roadway facility) and providing a BNSF railroad underpass in the City of Moore between S. Broadway Avenue and S. Eastern Avenue. The purpose of the project is to improve safety and reduce delay time caused by the existing BNSF at-grade railroad crossing within the City of Moore on S.E. 4th Street (SH-37).

The proposed improvements include providing a new railroad bridge to be constructed for two tracks with room for a future track (2-track lanes currently exist). The existing roadway is a four-lane curb and gutter section and will be reconstructed as a four-lane curb and gutter section. A general project location map and a project overview map are enclosed.

The City of Moore is seeking funding through the Transportation Investment Generating Economic Recovery grant (TIGER grant) with the U.S. Department of Transportation (DOT). The highly competitive TIGER grant program supports innovative projects, such as the one being proposed by the City of Moore, which are difficult to fund through traditional federal programs. More information on the TIGER grant will be provided at the public meeting.

The proposed change is in the early development stages and any comments relative to the social, economic, or environmental effects of this proposal will be appreciated. To allow adequate time for evaluation of your comments, we would appreciate receiving a response by February 9, 2017. Your written comments should be directed to the Capital Planning and Resiliency, City of Moore, 301 N. Broadway Avenue, Moore, Oklahoma 73160.

A public meeting to present project information and receive public input will be held **at 6:30 p.m. on January 26, 2017 at The Station at Central Park, 700 S. Broadway Avenue Moore, Oklahoma 73160**. Should you have any questions regarding the project, Jared Jakubowski, Grants Manager, City of Moore at (405) 793-4571, JJakubowski@cityofmoore.com.

Sincerely,

Jared Jakubowski
Capital Planning and Resiliency

JJ:Able Consulting
Enclosures: Location Map