From: Miyamoto, Faith
To: Ohtomo, Nami; Spurgeon, Lawrence; Chan, Veronica
CC: donna.turchie@fta.dot.gov; Banao, Kenneth; Kurio, Phyllis
Sent: 5/22/2006 8:29:15 AM
Subject: FW: Honolulu High-Capacity Transit Corridor Project --EPA Comments on EJ Analysis

Hi Nami, Lawrence and Veronica -

Forwarding Debbie and Connell's comments. Do we have any problems with what they say?

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-----Original Message-----
From: Lowe.Debbie@epamail.epa.gov [mailto:Lowe.Debbie@epamail.epa.gov]
Sent: Monday, May 22, 2006 6:59 AM
To: Miyamoto, Faith
Cc: Dunning.Connell@epamail.epa.gov
Subject: Honolulu High-Capacity Transit Corridor Project --EPA Comments on EJ Analysis

Faith,

Connell Dunning and I have reviewed the report titled "Environmental Justice in the OMPO Planning Process: Defining Environmental Justice Populations." This is a very interesting report which aims to identify minority and low-income census block groups in a way that makes sense for the island of Oahu. From EPA's perspective, it is appropriate for the Honolulu High-Capacity Transit Corridor project to use the minority and low-income block groups identified in this report as the starting point for the EJ analysis. In using this report, EPA provides the following three suggestions:
(1) As mentioned during the conference call, the report is statistically complex, and may be difficult for the general public to understand. During the conference call, someone mentioned that the normalized concentration curves essentially defined the cut-off point to be one standard deviation from the mean. The standard deviation for at least two minority groups (EPA suggests Native Hawaiian and Other Pacific Islanders be one of the groups) be calculated in order to be able to explain the methodology more clearly.
(2) As Debbie mentioned during the call, if the OMPO report is used to identify low-income and minority census block groups, then the island of Oahu should be used as the reference group for the linguistic isolation analysis.
(3) As Debbie mentioned during the call, population below poverty can be difficult for some people to understand, and median household income information should be provided whenever possible. The OMPO report conducts the analysis of low-income populations based on poverty thresholds, but reports the information in Table 3 using both population below poverty and median household income. I recommend this project also report low-income in the same manner, using both population below poverty and median household income.

EPA guidance says to use the Department of Health and Human Services poverty guidelines to define low-income populations. However, as stated during the conference call, there is no data available to conduct this analysis at the cenus block group level for an entire county. Neither the Census Bureau nor the US Department of Health and Human Services prepare tabulations of the number of people below the HHS poverty guidelines. Using the census poverty threholds (as was done in the OMPO report) is appropriate for this EJ analysis.

If you have any questions about these comments, feel free to contact myself or Connell Dunning.

Thanks,

Debbie Lowe