

Oregon Department of Transportation



Environmental Justice 2024

Office of Equity and Civil Rights

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On the cover: the Mitchell Point Tunnel Dedication as photographed by ODOT staff.

AGENCY INTRODUCTION

ODOT Mission Statement

Oregon Department of Transportation Mission Statement: We provide a safe and reliable multimodal transportation system that connects people and helps Oregon's communities and economy thrive.

Agency Leadership

The **Oregon Transportation Commission (OTC)** establishes state transportation policy. The commission also guides the planning, development and management of a statewide integrated transportation network that provides efficient access, is safe, and enhances Oregon's economy and livability. The governor appoints five commissioners, ensuring that different geographic regions of the state are represented. One member must live east of the Cascade Range; no more than three members can belong to one political party.

A team of experienced administrators manages ODOT's daily operations, led by **Director Kris Strickler**.

Environmental Justice Personnel

ODOT's **Office of Equity and Civil Rights (OECR)** is responsible for ensuring the agency's environmental justice, federal civil rights, and other nondiscrimination policies are incorporated into all agency programs, policies and activities. Because ODOT is a large agency with a variety of funding streams and divisions, OECR coordinates with staff across the agency to integrate EJ into their projects.

Key personnel who manage OECR's EJ functions include:

- Angela Crain, Manager, Office of Equity and Civil Rights
- Brenda Gessner, Title VI, ADA and EJ Program Manager
- David Morrissey, Equity Manager

Agency Programs

ODOT's programs support Oregon's system of

- Highways, roads and bridges.
- Railways.
- Public transportation services.
- Transportation safety programs.
- Driver and vehicle licensing.
- Motor carrier regulation.

Agency Budget and Revenue Sources

The money used to preserve, improve and operate Oregon's transportation system comes from several major sources including but not limited to motor vehicle registration and title fees, driver license fees, motor vehicle fuel taxes, weight-mile tax and federal funding. The agency produces a variety of [revenue forecasts and economic reports](#) on a regular basis, available on ODOT's website. ODOT's Audit Section provides an essential audit and oversight service to management to improve accountability and protect the public. ODOT also assists local governments across Oregon with transportation project funding and grant opportunities.

ODOT is an Equal Employment Opportunity and Affirmative Action (EEO/AA) employer. ODOT does not discriminate on the basis of disability in admission or access to its programs, services, activities, hiring and employment practices. For questions about EEO/AA at ODOT, contact ODOT HR toll free at 877-336-6368 (EEO-ODOT), through Oregon Relay Service at 7-1-1, or email AskHR@odot.oregon.gov.

ODOT ensures meaningful access to programs, services and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and other services. For more information about this plan, or to request a different format or language, contact ODOT Office of Equity and Civil Rights (OECR) toll free at **855-540-6655**, through Oregon Relay Service at 7-1-1, or email ODOT.TitleVI@odot.oregon.gov.

Traducción e Interpretación | Biên Dịch và Thông Dịch | अनुवादन तथा व्याख्या

口笔译服务 | Устный и письменный перевод | Turjumaad iyo Fasiraad

Письмовий і усний переклад | Traducere și interpretariat |

Chiaku me Awewen Kapas |

EXECUTIVE SUMMARY

The Oregon Department of Transportation (ODOT) addresses environmental justice (EJ) through a combination of policies, initiatives and programs aimed at ensuring that transportation planning, decision-making and infrastructure development do not disproportionately harm or exclude vulnerable communities, particularly low-income, minority and historically underserved populations.

Below are key aspects of ODOT's approach to environmental justice:

Environmental Justice Policy

ODOT follows federal guidelines for environmental justice, as outlined in Executive Order 12898 (1994), which directs federal agencies to consider the environmental and health impacts on minority and low-income communities. The department ensures that environmental impacts from transportation projects are distributed fairly and that marginalized communities are meaningfully engaged in decision-making.

Community Involvement and Outreach

ODOT emphasizes inclusive public outreach and community engagement in transportation planning and project development. The goal is to involve vulnerable populations early in the process to ensure that their concerns are heard and considered. This includes:

- Holding public meetings in accessible locations and at convenient times.
- Using multiple communication methods (e.g., online platforms, flyers, and targeted outreach).
- Ensuring that materials are available in languages spoken by affected communities.

Equitable Transportation Planning

ODOT integrates environmental justice principles into its transportation planning process including:

- **Assessing Impacts:** Before moving forward with major transportation projects, ODOT conducts Environmental Justice (EJ) analyses to evaluate the potential impacts on disadvantaged communities. These analyses consider factors like air quality, noise and accessibility to essential services.
- **Equity in Project Design:** When designing projects, ODOT prioritizes minimizing adverse effects on vulnerable communities, such as noise pollution, air pollution and displacement. Projects are also designed to improve accessibility to transportation options, particularly for underserved communities.

Social Equity in Funding Decisions

ODOT allocates funding for transportation projects with a focus on equity, ensuring that disadvantaged communities benefit from transportation improvements. The department works with other agencies to identify areas of need and prioritize investments that will have positive impacts on low-income, minority and other underserved populations.

Addressing Environmental Health and Climate Change

ODOT addresses issues related to environmental justice by working to reduce the transportation sector's carbon footprint and its negative impacts on air quality, particularly in communities that are already burdened by pollution. These efforts focus on reducing the carbon footprint of the transportation sector while ensuring that the benefits of clean, efficient transportation systems are accessible to all Oregonians, particularly those in vulnerable communities. This includes efforts to promote cleaner transportation options (e.g., electric vehicles, improved public transit), improve active transportation infrastructure (e.g., bike lanes, pedestrian paths) and support climate resilience in vulnerable communities.

Partnerships with Community Organizations

ODOT collaborates with community-based organizations and advocacy groups that represent marginalized populations. These partnerships help ensure that community needs and concerns are integrated into transportation planning and that communities have access to resources and information.

Data Collection and Analysis

ODOT collects and analyzes data on transportation access and environmental impacts in different communities to identify disparities. ODOT uses Geographic Information Systems (GIS) and other tools to better understand where marginalized populations are located and how they are affected by transportation projects.

Title VI Compliance

As part of its commitment to civil rights, ODOT adheres to Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color or national origin. The agency is required to assess how transportation projects may affect minority populations and ensure that no group is unfairly burdened by adverse environmental effects.

Equity Advisory Committees

ODOT has established advisory committees focused on equity and EJ issues. These committees provide input on transportation policies and projects, ensuring that the voices of underserved communities are represented in decision-making processes.

Training

ODOT staff participate in federal and local EJ training webinars and classes to continue to learn more about EJ best practices. ODOT also has a quarterly EJ @ Roundtable Workgroup that discusses EJ at ODOT. ODOT also has additional advisory committees that discuss equity; all these internal groups have a component of continued EJ and equity learning. In addition, ODOT offers internal staff and local agencies access to training on environmental justice, public participation, nondiscrimination laws and other beneficial training sessions to improve public outreach, equity, EJ and to learn best practices from one another.

Conclusion

ODOT's approach to environmental justice is comprehensive and aligned with both federal and state policies aimed at addressing disparities in transportation infrastructure and environmental impacts. Through community engagement, equitable planning, data analysis and targeted investments, ODOT strives to ensure that all communities, particularly disadvantaged and marginalized populations, are not left behind in Oregon's transportation development. ODOT welcomes continued partnership with Oregon's Environmental Justice Council in 2025 to advance statewide EJ strategies and goals, including through continued participation in the initiative for development of Oregon's environmental justice mapping tool.

EJ IMPLEMENTATION UNDER ORS 182.550

Section One: Addressing Environmental Justice Issues.

As the state transportation agency, ODOT plays a critical role in decisions and actions that have potential impacts on the environment and people of Oregon. In Oregon, Environmental Justice is defined in ORS 182.535 Section 3 as:

“The equal protection from environmental and health risks, fair treatment and meaningful involvement in decision making of all people regardless of race, color, national origin, immigration status, income or other identities with respect to the development, implementation and enforcement of environmental laws, regulations and policies that affect the environment in which people live, work, learn and practice spirituality and culture.”

ODOT must ensure that negative effects of transportation projects do not disproportionately impact traditionally underrepresented populations. Additionally, ODOT receives federal financial assistance, requiring the agency to comply with certain nondiscrimination laws and regulations, including the Civil Rights Act of 1964 and Executive Order 12898 on Environmental Justice. US Department of Transportation (USDOT) outlines fundamental principles of EJ that guide ODOT actions:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations.
2. To ensure the 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 and low-income populations.

This report of ODOT’s 2024 EJ activities reflects intentional efforts, through multiple levels of the organization working together as “One ODOT”, to implement environmental justice considerations into its operations. It accomplishes this through identifying disproportionately affected communities, creating opportunities for meaningful public participation from these communities, and advancing the communities’ interests through project planning, implementation, analysis and accountability.

Transportation Planning Unit

ODOT's [Transportation Planning Unit](#) supports the development, refinement and implementation of statewide multi-modal transportation plans; the Planning and Technical Guidance website contains resource documents. The Planning Unit created a 2015 Manual, [Guidelines for Addressing Title VI and Environmental Justice in Transportation](#). The manual discusses the history of Title VI and EJ in transportation planning and describes four distinct and important phases to ensure that Title VI and EJ populations are considered and included in project scoping and execution: scoping, public involvement and outreach, solution alternatives analysis and reporting. The Planning Unit has several project areas and [statewide policy plans](#) that impact EJ and underserved communities including the Transportation and Growth Management Program (TGM) Projects, Climate-Friendly and Equitable Communities (CFEC), Oregon Highway Plan (OHP) and Oregon Transportation Plan (OTP).

All **TGM projects** must be in conformance with [TGM](#) objectives. Equity is specifically called out to provide transportation choices to support communities with the balanced and interconnected transportation networks necessary for mobility, equity and economic growth. Mobility choices for underserved communities and those with limited options. All TGM projects are expected to address equity both in purpose and approach. The 2024 planning grants application required a response to how equity would be addressed in the proposed project: How will the project approach support investment decisions for Safe Systems, Climate Action and Equitable Outcomes?

ODOT's **Climate Friendly and Equitable Communities (CFEC)** program requires cities and counties within metropolitan areas to use an equity-focused public engagement program for transportation system planning work and to plan for a more equitable multimodal transportation system. To get to these end goals, jurisdictions must recognize ways that planning policies and climate change have harmed or are likely to harm underserved populations. Jurisdictions must also integrate equity considerations into how transportation projects are prioritized for funding. The [CFEC](#) team in 2023 supported the development of guidance, technical tools and a funding program to support this work at the local level. This work includes:

- Scenario planning and greenhouse gas reduction target setting at local levels.
- Updating the Transportation System Guidelines.
- Updating the Analysis Procedures Manual transportation demand modeling guidance.
- Establishing a new funding program to support local Transportation System Plan updates along with a statement of work template that implements guidance updates.
- Developing a statewide multimodal inventory database for planning purposes.

Environmental justice is a critical consideration in the development of the **Oregon Highway Plan (OHP)**. ODOT is beginning a [comprehensive update to the Oregon Highway Plan \(OHP\)](#). The new OHP will not just be about highways, but rather about all that happens on roadways, how the modes interact, and how to prioritize investments and make decisions about the full system. The new OHP will help implement the goals and strategies of the 2023 Oregon Transportation Plan (OTP) as they apply to the roadway system. Expect a system user-focused plan with an emphasis on climate, equity and safety and a major effort to meet current and anticipated needs of the OHP such as how to update the old mobility policy and how to reflect and support new initiatives such as Climate Friendly and Equitable Communities. There will be a variety of opportunities to participate and help make sure the new OHP reflects community priorities. The update project is just beginning. The new OHP will address this issue through deliberate and extensive outreach to groups most impacted by Oregon's highway system.

The **OTP** incorporated a robust public engagement program when updating this statewide plan completed in 2023. The Transportation Planning Unit staff led the public engagement process throughout development of the plan. The [OTP](#) public outreach effort was a commitment from the onset to reflect the voices and perspectives of people and communities who have been historically excluded and underserved by transportation investments, including:

- People with low income and/or people who are economically disadvantaged.
- Black, Indigenous and People of Color (BIPOC).
- Older adults, youth and children.
- People who speak non-English languages, especially those with limited English proficiency.
- People living with a disability.

The OTP is also a prime example of how the Planning Unit coordinates across the agency and with external partners to develop policies in statewide plans that intentionally and meaningfully incorporate EJ to achieve equitable outcomes around Oregon's entire transportation system.

Climate Office

ODOT's [Climate Office](#) mission is to identify and pursue actions that reduce transportation greenhouse gas (GHG) emissions. The office is also charged with helping the agency understand, prepare, and respond to the impacts of climate change and extreme weather. The impacts of transportation emissions and climate change often disproportionately impact disadvantaged communities, including increased health risks and exposure to extreme weather events such as flooding and wildfires.

National Environmental Policy Act (NEPA) Program

ODOT's [National Environmental Policy Act \(NEPA\) Program](#) collaborates regularly with FHWA regarding EJ compliance for ODOT projects in the NEPA phase of project development. The NEPA Program develops and maintains the appropriate FHWA guidance to ensure ODOT FHWA-nexus projects comply with the latest federal EJ and NEPA expectations. The NEPA Program serves as subject matter experts to ODOT region offices, consultants, and local agencies when questions arise or during any FHWA NEPA document review. Current FHWA EJ and NEPA guidance for Categorical Exclusion (CE) NEPA documents is up-to-date and located in the ODOT NEPA Manual in Section 426.3-4. This guidance covers, in general, about 94% of all FHWA-nexus projects developed through the NEPA phase at ODOT each year. There are many resources available for ODOT staff including an EJ Evaluation Checklist that covers demographics, public involvement, assessment of impact, and documentation.

Public Transportation Division (PTD)

ODOT's [Public Transportation Division \(PTD\)](#) has a strong commitment to equity. PTD encompasses public transit, active transportation (e.g., investing in bike and pedestrian infrastructure), passenger rail, grant programs like the Innovative Mobility Program and resources for transportation options to provide people with more ways to get around.

Environmental Justice is a key consideration in public transportation policy, working to make transportation systems more equitable and sustainable. For PTD that includes improving access to transportation options like walking, bicycling, transit and reducing negative environmental health impacts by decreasing automobile traffic and associated emissions. Communities are included in decision making to make sure solutions meet current local challenges. PTD focuses on providing services for low-income communities, people with disabilities, seniors, veterans and rural communities.

PTD supports 60 transit systems across the state to purchase equipment, fund transit operations and improve customer service by distributing federal formula funds, offering grant opportunities and managing the **Statewide Transportation Improvement Fund (STIF)**. Additionally, about 20 community and nonprofit providers benefit from sub-grant relationships. The [STIF](#) Formula program distributes state funds quarterly to 41 qualified entities, including transit districts, federally recognized tribes and counties.

PTD manages over 200 active grants as part of the **Safe Routes to School, Oregon Community Paths, Innovative Mobility Program and Transportation Options programs**. Many of the grantees are communities representing low-income and transportation disadvantaged Oregonians. For example, Innovative Mobility Program Microgrants funded a community health group in The Dalles to meet a local need by installing bicycle repair stations and providing bicycle safety education to youth. The Safe Routes to School program funded enhanced crosswalks to help students at low-income schools in Medford cross the street safely.

PTD co-funds the **Amtrak Cascades intercity passenger rail service** with the Washington State Department of Transportation (WSDOT). High-priority efforts are underway to improve passenger and freight rail in Oregon. Improvements to passenger rail will enhance the customer experience namely by increasing the reliability of the service to get people where they want to go on time and in comfort.

Beyond financial resources, PTD provides compliance oversight, training and technical assistance to partner agencies through its **Technical Resource Center**. This support spans various areas, including transit operations, capital, planning and administration. Support also includes environmental justice topics such as accessible transit and paratransit, integrating human services, public engagement, demographics and the transition to clean fuels.

PTD engages partners at the state level and supports partner agencies in doing so at the local level. At the state level there are four standing committees under the umbrella of the division: **Public Transit Advisory Committee (PTAC), Oregon Bicycle and Pedestrian Advisory Committee (OBPAC), Rail Advisory Committee (RAC) and the Safe Routes to School Advisory Committee (SRAC)**. Membership in these statewide committees is balanced to ensure diverse representation. For example, committees include tribal members, members with disabilities, youth, elders and members representing communities of color.

Urban Mobility Office (UMO)

ODOT's [Urban Mobility Office \(UMO\)](#) is a key implementer of environmental justice through a variety of high profile, high impact projects in the Portland metropolitan area. The Oregon Department of Transportation's Urban Mobility Strategy is a cohesive approach to reduce congestion, improve safety and modernize the region's aging transportation system. Combined with ODOT's partnerships and investments in transit and active transportation, these projects will address transportation problems facing the Portland region for generations to come.

The [I-5 Rose Quarter Improvement Project](#) is seeking to help repair past harms to the Historic Albina community stemming from the original construction of Interstate 5 through Albina. Albina is the business, cultural and social center of Portland's Black community, which comprises 5.6% of the city's population (2021 American Community Survey data). ODOT is doing this by centering the [voices of historic Albina residents](#) in decisions concerning the design and construction of the project, especially the highway cover which will support jobs, development and wealth creating opportunities for community members.

For the [Regional Mobility Pricing Program \(RMPP\)](#), the [I-205 Toll Project](#) and development of the [Oregon Toll Program](#), ODOT utilized an Equity Framework to guide the outcome and the process for equity related to EJ communities. This framework was developed with the **Equity and Mobility Advisory Committee (EMAC)**. Governor Kotek has halted further work on these efforts on these efforts on March 13, 2024. The [I-205 Abernethy Bridge Project](#) is currently under construction.

The [I-5 Boone Bridge Replacement Project](#) is in a federal **Planning and Environmental Linkages (PEL) process**, as well as state-required **Climate Friendly Equitable Communities (CFEC) 0830** review. Planning and Environment Linkages (PEL) represents a collaborative and integrated approach to transportation decision-making that considers environmental, community and economic goals early in the transportation planning process, and uses the information, analysis and products developed during planning to inform the environmental review process. ODOT uses census data and working with local agencies and Non-Governmental Organizations (NGOs) to identify the EJ populations in the communities surround the Boone Bridge so we can engage with those populations. Focus Groups were conducted with historically unrepresented populations, including Spanish speakers and seniors. Staff also communicated with tribal entities by providing information. A deeper briefing was provided to the Confederated Tribes of the Grande Ronde at their request.

[Westside Multimodal Improvement Study](#) (WMIS) has worked with two local Community Based Organizations (APANO and Centro Cultural) to conduct focus groups in Spanish, Vietnamese and Chinese to gain input from the minority populations most significantly represented in the study area.

Section Two: Increasing public participation of individuals and communities affected by the agency's decisions.

ODOT meaningfully involves the public in important decisions by providing for early, open, continuous and effective public participation in, and access to, key planning and project decision-making processes. Outreach and engagement efforts are tailored specifically to EJ communities that could be impacted by projects. ODOT documents outreach, feedback and input received and the disposition of that feedback. Any analysis of impacts to EJ communities considers benefits and mitigation, as well as impacts, to determine the EJ finding for the project.

- Broad, diverse membership on project committees and in work groups.
- In-language outreach and translated materials supported by Community Engagement Liaisons (CEL) who speak Spanish, Vietnamese, Russian and Chinese.
- Compensating qualifying participants for their time and effort through the Equitable Engagement Compensation Program (EECP). While many communities face a variety of barriers to participate, providing financial incentives is one way to welcome more voices.
- Engaging community-based organizations.
- Video series highlighting the stories and voices of underserved community members around their lived experiences with transportation.
- Clearly communicating how feedback shapes outcomes throughout the project.
- Engagement in long-term planning and visioning by ODOT's long-term planning processes. Long-term plans such as the OTP and Statewide Transportation Improvement Program (STIP), involve significant public input. These planning efforts help set the direction for transportation investments across the state, and public feedback is integrated into the development of both policy and project priorities.
- Collaborations with local governments and Tribes. This collaboration ensures that transportation decisions reflect local needs and priorities. Tribes have a voice in decisions that might affect their lands or cultural heritage.
- Project-specific feedback mechanism by providing opportunities for project-specific feedback through community meetings, online portals and other outreach tools. This allows community members to have a direct say in specific aspects of transportation projects, such as road designs, bike lanes, transit services and safety improvements.
- Complete environmental and social impact assessments. For significant projects, ODOT conducts Environmental Impact Statements (EIS) or Environmental Assessments (EA) to analyze the potential effects of transportation decisions on the environment, community health and social fabric. Public comment periods are an essential part of this process.

NEPA practitioners reside in all five regions across the state. They are responsible for capturing the public participation for each FHWA-nexus project and providing a summary of that participation, including any substantive comments, in FHWA NEPA documents. As per the FHWA environmental justice guidance, the ODOT NEPA Program advises region NEPA staff, consultants and local agencies to encourage project leaders and communication officials to follow the Guide when determining their public, agency and partner engagement plans for each FHWA-nexus project. The relevant sections of the ODOT NEPA Manual that cover public participation requirements for FHWA-nexus projects are 412; and 426.3-4,9,16- 17,19.

The **Climate Office** conducts targeted engagement with the public, environmental groups, and community organizations to increase participation and to inform key decisions and outcomes for projects. In addition, Climate Office utilizes **GovDelivery** system to provide regular updates to stakeholder groups. The **Community Charging Rebates Program** has actively engaged local stakeholders and organizations, prioritizing outreach in rural and disadvantaged communities by collaborating with Tribes, local leaders and nonprofits to promote awareness and accessibility of funding opportunities for electric vehicle charging infrastructure. Through these efforts, including workshops and informational sessions, the program seeks to ensure that these diverse communities can effectively benefit from the available rebates. The **Climate Office Adaptation Program** conducted targeted outreach to all nine federally recognized Tribes in Oregon to share information about climate-related funding opportunities. A follow up meeting was held to solicit ideas from interested Tribes for adaptation and resilience project partnerships. ODOT Climate Office and Region 5 staff partnered with the Burns Paiute Tribe on a project to improve flood and landslide resilience along Highway 20 in eastern Oregon. The project responds to an extreme flood event that destroyed the Tribal Headquarters building, damaged other property and required ODOT removal of more than six feet of debris on several miles of road. The project design incorporates flood resilience elements that also support ongoing wildlife resilience building efforts. ODOT is continuing to work with the Tribe to pursue project funding.

In all our projects in **UMO**, we utilize data driven methods to identify what EJ populations are in a project or study area. We identify and **contract with Community Based Organizations (CBOs)** to assist in informing and engaging EJ communities, for example by co-hosting focus groups in other languages. We utilize ODOT's **Equity Engagement Compensation Program (EECP)** to compensate eligible participants for their time.

The **UMO** team provides community engagement through individual briefings, in-person events/open houses, traveler surveys, on-line open houses, webinars, traditional and social media activities and public committee meetings. We actively engage non-native English speakers in our project areas through dual lingual online open houses, translators at in-person open houses, and community engagement liaison outreach to groups speaking Spanish, Russian, simplified and traditional Chinese and Vietnamese. Materials are also translated in these languages.

The **I-5 Rose Quarter Improvement Project** team continues to intentionally prioritize, listen to, inform, engage and empower Portland's Black community as the primary community impacted and displaced by past public and private development decisions in the project area. The main vehicle for this is with the **Historic Albina Advisory Board (HAAB)**. ODOT formed the HAAB in December 2020 based on the project's values and direction from community advocates to create such a committee. The purpose of the HAAB is to elevate voices in the black community to ensure that project outcomes reflect community interests and values, and that historic Albina directly benefits from the investments of this project.

The **HAAB** brings community perspectives concerning elements that most directly support community connections, urban design, and wealth generation in the Black and historic Albina community into the project's decision-making process. The HAAB advises on project design and informs potential partnerships between ODOT and other agencies, businesses and organizations. Board members review project information, discuss and deliberate, and provide interest- and value-based advice and recommendations to project leadership to substantively inform its recommendations to the Oregon Transportation Commission.

In 2024, the **PTD** began work on **Web Content Accessibility Guidelines** to support partner agencies in meeting new US Department of Justice requirements intended to increase the public's access to information. PTD began an assessment of internal documents and websites to ensure materials are accessible to those experiencing low vision, limited English proficiency or low literacy. PTD is reviewing all ODOTs grant programs for equity, safety and climate prioritization as part of ODOTs **Strategic Action Plan**. PTD is leading an effort to improve the consideration and prioritization of equity in bicycle and pedestrian projects in response to internal **2024 ODOT audit** recommendations. These initiatives will include an evaluation of public engagement, especially for underserved communities. Additionally, transit agencies are required to engage and receive input from local community members in their development of their **Statewide Transportation Improvement Fund Plans** and requests for funding as an ODOT requirement for approval.

PTD leveraged several communications and outreach strategies to engage the public, increasing mobility and accessibility for passenger rail in Oregon. In fall 2023, Amtrak Cascades introduced a **simplified fare structure** with more flexible and affordable options. With the new fares, customers are now able to modify their booking without penalty if they need to change their trip or receive full refunds if they need to cancel their trip. These improvements build on other recent pricing enhancements Amtrak has done to make travel more affordable. This includes a **children's discount** so that all children between 2 and 12 can travel for 50% off with an accompanying adult, whereas previously, this policy was limited to one child discount per adult fare. Additionally, passenger discounts, such as senior and military, have been expanded to apply to all fares, including sales.

Additional ways ODOT seeks public input about project scope, public interest levels, and potential for adverse effects, public input is sought during the development of projects include:

- ODOT involves the public in important decisions by providing early, open, continuous and effective public participation in, and access to, key planning and project decision-making processes.
- Low literacy and LEP populations, older adults, disabled persons, low-income populations and other identified disadvantaged people are offered alternative accommodations (e.g., interpretation services, transportation, childcare) and EECP to participate in project development activities, as appropriate.
- Public outreach is used for projects where there are practical project alternatives and/or where the project would involve potential relocations of residences and/or businesses.
- Public meetings are held in ADA-accessible facilities.
- ODOT provides advisory notices to the public and any potentially affected EJ communities for upcoming construction activities that could affect the local transportation system including detours, public road and access restrictions and delays.
- Local agencies applying for **TGM** funds must include public involvement throughout the project, with special emphasis on engaging historically unrepresented populations. Applicants must describe how they identify historically and currently underserved communities, how impacts to those communities will be addressed and how public participation will be encouraged.

Section Three: Determining the effect of the agency's decisions on EJ communities.

ODOT considers the impact of its decisions on EJ communities by following guidelines and practices that align with both federal and state requirements. The goal is to ensure that transportation projects and policies do not disproportionately harm low-income, minority or otherwise disadvantaged communities and, when possible, provide benefits to these groups. Here's how ODOT typically determines the effect of its decisions on EJ communities:

Identifying Environmental Justice Communities

ODOT first identifies possible EJ communities based on demographic data, which includes racial, ethnic and income characteristics. These communities are often defined as areas with higher-than-average percentages of minority populations or low-income households.

Census Data

ODOT uses U.S. Census data, often in combination with other local data sources, to identify communities that may qualify as EJ populations.

Environmental Factors

ODOT also looks at existing environmental burdens in these areas, such as pollution levels, proximity to transportation corridors or areas that are already overburdened by environmental risks.

Environmental Justice Analysis

ODOT conducts an Environmental Justice analysis for each transportation project that could potentially affect these communities. This analysis is often part of the broader Environmental Impact Statement (EIS) or Environmental Assessment (EA) required for major projects.

Disproportionate Impact Assessment

ODOT evaluates whether a proposed transportation project will have a disproportionately negative impact on EJ communities. This involves looking at both direct and indirect effects on health, quality of life and access to essential services, including:

- Noise and air pollution.
- Traffic congestion or changes in traffic patterns.
- Displacement of people or businesses.
- Changes in access to healthcare, education and employment opportunities.

Mitigation Measures

If adverse effects are found, ODOT works to identify strategies to mitigate those impacts, such as designing projects to avoid residential areas, reducing noise levels or offering relocation assistance if displacement occurs.

Benefits to Environmental Justice Communities

Beyond assessing negative impacts, ODOT also considers how transportation projects can benefit EJ communities. These benefits might include:

- Improved access projects designed to improve access to public transportation, facilities, websites and other services.
- Economic opportunities employment opportunities related to the construction and maintenance of transportation infrastructure.
- Environmental improvements projects that address environmental contamination, reduce pollution or increase green spaces in EJ areas.

NEPA and Communication Plans

For major projects, ODOT develops a NEPA and Communication Plan that outlines how EJ concerns will be addressed throughout the project's lifecycle, from planning to construction and beyond. These plans may include specific mitigation measures, compensation strategies, outreach and timelines for addressing community concerns.

Compliance with Federal and State Regulations

ODOT's approach to EJ is guided by federal regulations and executive orders:

- Executive Order 12898 (1994) directs federal agencies to consider environmental justice in their decision-making processes and to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations.
- Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal assistance.
- NEPA requires federal agencies to assess the environmental and social impacts of major projects and consider EJ communities in that process.

Public Involvement and Consultation

Public participation is a key component of ODOT's approach to Environmental Justice. ODOT sponsors key public engagement activities throughout the various phases of a project, including pre-scoping, scoping, preconstruction, construction, and project debriefs with community members and other key partners. Examples include:

- Project presentations at community gatherings, community events, online and at in-person open houses.
- Public hearings.
- Interviews, discussion, surveys and focus groups.
- Door-to-door business canvassing outreach, breakfasts with community leaders and partners, website updates and newsletters, tabling at community events, project mailers, newspaper ads, social media content and project videos.
- Community briefings, including briefings with local business organizations.
- Tabling at over five fairs, festivals and community events.
- Industry Forum events like “Meet the Primes.”
- Website updates, e-newsletters and project information mailers.

The Climate Office applies the ODOT [social equity lens](#) to program and project development to help understand the needs, benefits and burdens of agency actions on historically excluded communities. The Climate Office also utilizes the [State of Oregon Climate Equity Blueprint](#) to inform policies, processes and programs to address climate change. The [Social Equity Index Map](#) is used to identify EJ communities for investments, benefits or possible mitigation by Climate Office projects and programs.

PTD makes **strategic investments** to advance equity. PTD incorporates equity considerations into funding programs. When making funding decisions for state and federal fund programs alike, PTD evaluates the extent to which proposed projects might benefit low-income individuals and other historically marginalized communities. For example, in most PTD grant programs applicants submit demographic information from ODOTs social equity index. This information is used to score applications so that projects that support underserved communities are more likely to be awarded funding.

PTD uses federal funds in accordance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, and national origin. Through an enterprise licensing agreement, PTD provides **Remix planning software** to local transit systems, helping them identify underserved communities and ensure equitable transit options. PTD also collaborates closely with the Office of Equity and Civil Rights in these efforts.

Consistent with the requirements of Title VI of the Civil Rights Act of 1964, ODOT and its subrecipients consider potential adverse impacts when new transit facilities are planned, or major service changes are undertaken. The Federal Transit Administration (FTA) requires an **equity analysis** when planning and constructing new facilities, such as transit centers. ODOT is largely a pass through and administrator of FTA funds, ODOT has not had to conduct any facility equity analysis in the last year.

When existing state or federal designations can be used, PTD relies on those to help ensure that EJ communities are positively affected by agency decisions. For example, in the **Safe Routes to School (SRTS) Program** administered by PTD, preference for funding is given to **Title I schools** serving low-income students. In addition, the **Innovative Mobility Program** utilizes ODOT's **social equity index** to prioritize funding and projects and reduce match requirements.

Ongoing Monitoring and Feedback

After project completion, ODOT often monitors the ongoing effects on EJ communities. If adverse impacts arise during or after construction, the agency may take corrective actions, including adjustments to project design, traffic management or environmental remediation.

A key component of statewide plan implementation - including policies and actions connected to environmental justice - is monitoring and reporting on progress towards their achievement. The statewide **Transportation Planning Unit** and the **Transportation Planning Analysis Unit** - both under the **Statewide Policy and Planning Section** - will continue to develop the means of monitoring and reporting progress such as performance metrics and [web-based dashboard tools](#).

By systematically applying these methods, ODOT seeks to ensure that its transportation decisions are fair, equitable and sensitive to the needs of disadvantaged populations, while working to minimize harm and maximize positive outcomes for Environmental Justice communities.

Section Four: Improving plans to progress environmental justice in Oregon.

ODOT's EJ strategy reflects its ongoing commitment to promoting equity in programs, policies and activities that affect human health and the environment. ODOT's policy requires adherence to EJ goals throughout all its activities, including transportation planning and project development and to promote those goals through public outreach efforts conducted by ODOT and its subrecipients.

ODOT's commitment includes the recognition that infrastructure choices that are made at the state and local levels can strengthen communities, create pathways to jobs and improve the quality of life for individuals and communities across the state. By empowering communities to have a meaningful voice in transportation decisions, institutionalizing "best practices" internally and externally across ODOT programs, to continually pursuing excellence, ODOT ensures that EJ is an integral and effective part of all its activities.

Social Equity Index Map

The [Social Equity Index Map](#) was developed by ODOT staff and used across the agency. The map overlaps among Oregon's vulnerable populations and ODOT programs and projects. ODOT's Social Equity Index Map is a tool to assist staff in applying the social equity lens to ODOT's work and holding us accountable in prioritizing equity. This ArcGIS Online-based online interactive tool applies the Five-Year American Community Survey Data from 2017 to 2021 at the block group level to identify and acknowledge where Oregonians' vulnerable populations reside to assist ODOT project and program planning and implementation. The map illustrates community-level prevalence of inequity predictors that have been linked to inequitable transportation outcomes like pedestrian injury, air pollution, age and disability,

Strategic Action Plan

The [Strategic Action Plan \(SAP\)](#) highlights our commitment to serving all Oregonians. The 2024-2028 Strategic Action Plan identifies the top actions the OTC and ODOT will focus on over the next five years. It is not comprehensive of all agency efforts; rather, it identifies a narrow set of short-term priority actions that will best serve businesses and people who live, work and travel throughout Oregon. The plan revolves around three priorities – equity, modern transportation system and sufficient and reliable funding – that set the overall direction for the agency. The plan includes eight near-term strategic outcomes designed to advance multiple goals simultaneously. Each outcome unfolds into a set of implementing actions that represent the steps we need to take to successfully reach or advance our outcomes in 2024 to 2028.

State of the System

In 2024, ODOT rolled out a new webpage to be more transparent to the public measuring our priorities. The [State of the System](#) dashboard tells the story of how ODOT is doing in key transportation areas. The areas come from the **Oregon Transportation Plan** -- the guiding state transportation policy document -- and the ODOT **Strategic Action Plan**, which sets near-term commitments for the agency. ODOT uses the information on this website, which is updated regularly, to guide needed changes and improve performance. These changes are summarized on the bottom of each topic page, which highlights efforts underway from the Strategic Action Plan and beyond.

Transportation Project Tracker and Project List

The interactive [Transportation Project Tracker](#) shows how and where Oregon's state and federal transportation funds are spent by local, state and federal agencies. Project information provided includes the project scope, schedule and budget of projects and studies, including projects in the [Statewide Transportation Improvement Program](#) (STIP), ODOT's four-year capital improvement program. The [Project List](#) allows the public to also see project details including contact information, how to get alerts about the projects and available public outreach and feedback opportunities.

Public Transit Division

At the direction of the Oregon Transportation Commission in 2022, PTD created the **Innovative Mobility Program (IMP)**, which is designed to increase social equity, mobility and access while reducing the effects of climate change. The program has a total of \$20 million in state and federal funding for grants, contracts and administration. The program is designed to provide a range of funding opportunities, offering four types of competitive grants and one non-competitive grant. Each funding opportunity is designed to allow entities to scale projects over time. Grant projects must meet the core objectives of the program which are to improve historically underserved communities' access to public and active transportation, reduce the number of drive-alone trips and reduce greenhouse gas emissions.

The **Innovative Mobility Program** solicited for non-competitive “microgrants” in 2023 and 2024. Microgrants fund a variety of projects and activities such as education, demonstration projects, outreach and education and minor infrastructure projects. To date, the microgrant program has funded 85 microgrant projects across 24 counties, totaling more than \$600,000. Thirty-nine percent (39%) of the projects were in **rural areas** (outside of a Metropolitan Planning Area). Microgrants have reached new audiences with 47% of recipients receiving ODOT funding for the first time and 72% of recipients being nonprofits or community-based entities. Example projects include free bike repair clinics for those experiencing homelessness and extreme poverty, an e-bike lending library for residents of an affordable housing development and the planned pilot of a new bus route in Pendleton serving a low-income neighborhood. The microgrants enable communities to access funding that supports reducing greenhouse gas emissions through public and active transportation projects.

Innovative Mobility Program competitive funding opportunities will be available from 2024-2027. These grants are intended to fund shared mobility projects, from planning to implementation. Shared mobility refers to transportation services that are shared among users. Users may use the service at the same time or independently of one another. Examples include transit, rideshare, carshare and shared micromobility (e.g., e-bikes, scooters). Supporting the development and implementation of shared mobility services with an equity lens supports environmental justice.

ODOT’s Active Transportation Liaisons (ATL’s), PTD’s Regional Transit Coordinators (RTCs), and the Technical Resource Center are agency partners who support environmental justice. Examples include providing support for the development of **Coordinated Public Transit Human Services Transportation Plans**, generally referred to as Coordinated Plans. These are locally developed plans that identifies transportation needs of individuals with disabilities, older adults, veterans and people with low incomes. The plan provides prioritized strategies for meeting local needs, and describes responsible agencies, timelines and estimated cost.

In 2024, PTD began redesigning programming of its **Transit Network Explorer Tool (TNExT)** under a federal research and innovation grant involving Oregon, Washington and California. TNExT integrates U.S. Census and publicly available transit data, allowing planners to visualize the broader network and optimize connections. The upgrades to TNExT will help pinpoint gaps in access and improve service alternatives for underserved areas and populations.

Climate Office

The **Carbon Reduction Program** is a federal program created by the **Bipartisan Infrastructure Law** that provides Oregon \$82 million over five years to fund a variety of projects that reduce emissions from transportation. The **Justice40 Initiative** has made it a goal that 40% of the overall benefits of transportation federal investments flow to disadvantaged communities that are marginalized, underserved and overburdened. To achieve ODOT's equity and the Justice40 goals, equity considerations were incorporated into the scoring criteria for project identification. In addition to climate benefits and engagement, projects were assessed on the ability to mitigate impacts from emissions or reduce barriers and increase benefits to historically disadvantaged communities. ODOT estimates that approximately 61% of the funding from the Carbon Reduction Program funds allocated for fiscal years 2022-26 will benefit disadvantaged communities as defined by the Justice40 and the **Climate and Economic Justice Screening Tool**. Climate Office also worked through the agency's tribal liaisons to ensure Oregon's nine Tribes were aware of the funding opportunity. ODOT has awarded the Confederated Tribes of Grand Ronde an electric vehicles and chargers project, the Confederated Tribes of Warm Springs a solar street light project and the Confederated Tribes of Siletz Indians funding for a public electric vehicle charging project.

The **Community Charging Rebates (CCR) Program**, with up to \$7 million in funding aims to increase access to Level 2 charging stations in Oregon communities to encourage widespread EV adoption. The Program offers rebates to public and private entities to reduce the cost of purchasing, installing, and maintaining qualified Level 2 charging equipment at publicly accessible parking locations, workplaces and multi-family housing (MFH) throughout Oregon. Rebates are awarded to equipment owners on a first-come, first-served basis, with the majority of funds (70%) reserved for projects in priority communities, or those defined as disadvantaged and rural under this Program. ODOT used the statewide equity map to determine disadvantaged communities and the **Office of Rural Health's** designation as non-urban to determine rural communities. ODOT provided resources for outreach, education and technical assistance to reduce barriers for applicants and assist in the application process. In Round 1 and 2 funding opportunities, a total of 189 projects reserved funding, including 75 project sites located in disadvantaged communities and 70 project sites located in rural communities.

The **FHWA Electric Vehicle Charger Reliability and Accessibility Accelerator program** has awarded ODOT \$10 million in 2024 for public EV charging port repairs and station upgrades. The ODOT Climate Office will oversee the distribution of grant funds in Oregon. Private companies will be responsible for the port repairs and station upgrades and are required to contribute 20% matching funds to be eligible for the program. ODOT will prioritize charging stations located within **Disadvantaged Communities** as defined by the **Climate and Economic Justice Screening Tool (CEJST)** as part of the scoring criteria for project selection. To further address equity considerations, ODOT will prioritize charging stations located in rural areas as defined by the US Census Bureau. ODOT sent letters announcing the funding opportunity to all eligible locations in Oregon, including 41 sites located in Disadvantaged Communities identified by the CEJST Tool.

The **National Electric Vehicle Infrastructure (NEVI) Program** will provide Oregon with \$52 million over five years for public electric vehicle fast charging along major roads throughout Oregon. ODOT's NEVI State Plan includes a near term policy recommendation to target equity in charging and outlines how the agency will work to meet **Justice40 goals** and incorporate input from disadvantaged communities. The ODOT Climate Office hosted a series of in-person and virtual community meetings with targeted communities along eligible locations, including meetings in identified disadvantaged communities. The ODOT Climate Office also hosted a Tribal workshop to discuss opportunities and barriers preventing successful implementation on tribal land. ODOT utilized the feedback to inform charging station locations, and modified program requirements to allow for the primary applicant to partner with a federally recognized Tribe. Climate Office will incorporate these lessons and program design elements into future rounds of available funding.

The **Climate Adaptation and Resilience Roadmap** provides ODOT with policy guidance and actionable strategies for integrating climate change considerations into ways the agency plans for, invests in, builds, manages, maintains and supports the multi-modal transportation system. The roadmap includes a **Climate Equity** guiding principle to prioritize protection and resilience within marginalized, low-income and indigenous and Tribal communities, who are most at-risk of harm from climate hazards. The roadmap developed the **ODOT Climate Hazard Risk Map** which incorporates **ODOT Statewide Equity Index** as part of the **Corridor Risk Analysis** to identify priority corridors. The highest priority resilience corridors are those that indicate both climate risk and social disparity across the state. The analysis was updated in 2024 to reflect updated American Community Survey data. These updates will continue every five years to reflect the most up to date social equity data.

Section Five: Development of Environmental Justice Mapping Tool.

With the passage of **HB 4077** and the direction for agency participation to develop a statewide EJ mapping tool, ODOT staff formed an **EJ Mapping Working Group** in 2023 to participate in interagency mapping coordination. This group provided analyses of ODOT resources for this initiative. Representatives from ODOT's Climate Office, Research Office, Geographic Information Services Unit, Office of Equity and Civil Rights and Transit Section have attended meetings to inform the EJ mapping tool methodology development and the statewide EJ data inventory. An agency-wide effort was made to provide EJ-relevant ODOT data that could contribute to the tool's development.

In September 2023, the **ODOT EJ Mapping Working Group** successfully completed a foundational activity for development of the statewide EJ mapping initiative: inventorying existing ODOT data sets that could be considered for applicability to a statewide EJ mapping tool. ODOT staff identified over 40 data indicators for consideration, spanning topics such as:

- Crash Data.
- Statewide Strategic Investment Locations.
- Highway Performance Monitoring.
- Multi-Hazard Risk.
- Sea Level Rise.
- Coastal Flooding and Erosion Risks.
- Resilience Corridors.

ODOT staff currently use several mapping tools that are provided at the federal and local levels. We have ODOT specific mapping tools that we utilize internally. Many of these tools can be located on our website and utilized by other agencies. ODOT staff bring unique expertise in this area due to the agency's regular use of Geographic Information Services (GIS) and through the development of ODOT's Social Equity Index Map in recent years.

Limited English Proficiency (LEP), poverty rate, race/ethnicity, vulnerable populations and zero-vehicle households. The map provides a disparity index that measures intersectionality; those places where predictors of social vulnerability overlap show potential levels of inequity. The Social Equity Index Map information supports a better understanding of the communities who have been historically marginalized and how ODOT's work impacts these populations directly.

Additional ODOT programs engaged in map development and analyses include:

- The **Transportation Planning Section** provides support to the other groups within the Policy, Data and Analysis Division and the agency's region-level staff in the utilization of mapping tools like the **Oregon Social Equity Index Map**. The Transportation Planning Unit and the Transportation Planning Analysis Unit both support these efforts. The Transportation Planning Section is well suited to help develop evaluation criteria for high-level decision making such as prioritizing transportation system investments.
- The **Transportation Data Section** provides GIS support and mapping services to other groups within ODOT. The section also manages **motor vehicle crash data, traffic volume information and other roadway asset data** per Federal Highway Administration requirements.
- The **Public Transportation Division** uses the Social Equity Index to prioritize investments from **discretionary grant funding** in transportation disadvantaged areas of the state.
- The **Carbon Reduction Program** provided funding applicants with the **ODOT Statewide Equity Index map and FHWA Justice40 tools** to assist with identifying environmental justice communities.
- The **Community Charging Rebate** program created the **Community Charging Priority Type Locator map** using the ODOT Statewide Equity Index map to determine disadvantaged communities and assist program applicants.
- The **Climate Adaptation and Resilience Roadmap** includes development of the ODOT **Climate Hazard Risk Map** which incorporates **ODOT Statewide Equity Index** as part of the **Corridor Risk Analysis**.
- The **Climate-Friendly and Equitable Communities** program guidance and resources specifically developed reference tools such as **FHWA's EJ mapping tool and ODOT's Equity Index Map** as resources for local planning efforts.

In accordance with the Oregon Transportation Plan, ODOT has committed to prioritizing social equity. This will require using the best available EJ information. When the mapping tool is complete, ODOT will apply and evaluate it from a transportation perspective. For instance, ODOT's current Social Disparity Index (SDI), which includes transportation-specific equity measures, could be updated to integrate new data from the tool or a protocol for concurrent use of the SDI and the tool could be developed.

The **Urban Mobility Office** anticipates using the mapping tool to identify environmental justice populations and characterize existing socioeconomic and environmental benefits and burdens in these communities. For purposes of NEPA compliance, this will help project teams to understand and describe the affected environment or the potentially affected environmental justice populations, the community resources important to environmental justice communities and the issues affecting them. Determining project impacts in this context helps determine the need for design improvements, avoidance and minimization measures or the need for compensation. Environmental justice mapping has been used in ongoing projects such as the **I-205 draft Environmental Assessment** and the **RMPP Planning and Environmental Linkages work**.

ODOT staff continue to participate in the **interagency EJ Mapping Tool Methodology work group**, including evaluating the appropriateness of similar tools that have been developed in other states and nation-wide, as well as assessing different methodologies for aggregating indicators into an overall EJ index. Staff monitors discussions of the Oregon Environmental Justice Council Mapping Tool Subcommittee and anticipates meaningful participation in the effort throughout the interagency initiative.

EJ COUNCIL QUESTIONS

Question One: What is the process of analysis your agency uses to determine environmental justice considerations per ORS 182.535 Section 5? Please describe your progress towards implementing this analysis and provides examples such as policies, rulemaking, etc.

Equity is a core value at ODOT. Since 2020, the Assistant Director for the **Office of Equity and Civil Rights (OECR)** leads development of programmatic strategies to implement equity goal setting and processes across ODOT. Demographic and other data analyses, public participation actions, and an equitable engagement toolkit all support ODOT programs in conducting equity analyses.

Foundational analytical processes that ODOT conducts to address the agency's equity strategic priority include:

1. Identify community demographics, with attention to minority, low-income and limited English proficiency communities in the project area.
2. Develop and implement public involvement plans with strategies for reaching out to diverse communities.
3. Identify potential adverse impacts to minority and low-income communities resulting from the project (including impacts both to those displaced and those remaining). Assess cumulative impacts resulting from other activities in conjunction with ODOT projects.
4. Determine, in consultation with the Federal Highway Administration as appropriate, whether the project would have a disproportionately high and adverse effect on minority or low-income populations.
5. Identify and evaluate ways to avoid or reduce adverse and/or disproportionate impacts to EJ communities. Work with community members and leaders to suggest mitigation and enhancement measures that could avoid or offset potential adverse impacts.

ODOT is now implementing new internal guidance under the **Community Engagement Program** to ensure that new projects (not maintenance) are using components of the Equitable Engagement Toolkit for community outreach by 2025. Tools in this program include:

- The Equity Lens.
- Community Engagement Contractors (CEC).
- Equitable Engagement Compensation Program.
- Interpretation and Transition Guidance.
- Social Equity Index Map.

ODOT continually reviews and improves these resources in the actively ongoing **Engagement Toolkit** training. The **Interview Toolkit** was designed to increase transparency with job candidates, foster consistency in the hiring process, enhance accessibility for system users, and increase fairness in the interview process. The Engagement Toolkit is to utilize the viewpoints of those who reside in the communities ODOT serves and who are likely to be affected by the decisions that ODOT makes.

The **Equitable Engagement Compensation Policy** (EECP) was designed to reduce barriers that have systematically prevented historically excluded populations and others from participating in public engagement and advisory activities with the department.

As a core function of ODOT's equity priority, as well as implementation of Governor Brown's Executive Order 22-15, the agency continues its efforts to **diversify its workforce** as well as the agency's contractor and consultant community. ODOT is implementing various toolkits to support diversifying the agency's workforce and increasing engagement with Black, Tribal, and women-owned contractors, consultants, and community partners. In addition, under HB 2985, ODOT seeks to have **diverse representation** on all of our [advisory committees](#) to reflect state demographics and to reflect [social equity and advisory committees](#).

Projects implemented through **ODOT's Urban Mobility Office (UMO)** utilize data driven methods to identify environmental justice populations located within the project or study area. UMO staff listen to community members and leaders to identify environmental justice populations that have been historically underrepresented in transportation planning.

ODOT projects are subject to the National Environmental Policy Act, which includes environmental justice considerations. ODOT's **NEPA Program** collaborates regularly with FHWA (both the Oregon Division as well as the FHWA national Project Delivery Office EJ subject matter experts) regarding FHWA EJ compliance for ODOT projects in the NEPA phase of project development.

ODOT's **Climate Friendly and Equitable Communities (CFEC)** program requires cities and counties within metropolitan areas to use an equity-focused public engagement program for transportation system planning work and to plan for a more equitable multimodal transportation system. To get to these end goals, jurisdictions must recognize ways that planning policies and climate change have harmed or are likely to harm underserved populations. Jurisdictions must also integrate equity considerations into how transportation projects are prioritized for funding. The CFEC team in 2023 supported the development of guidance, technical tools and a funding program to support this work at the local level. This work includes:

- Scenario planning and greenhouse gas reduction target setting at the regional and local levels.
- Updates to the Transportation System Guidelines.
- Updates to the Analysis Procedures Manual transportation demand modeling guidance.
- Establishing a new funding program to support local Transportation System Plan updates along with a statement of work template that implements guidance updates.
- Developing a statewide multimodal inventory database to be used for planning purposes.

Question Two: What is the extent of meaningful involvement your agency facilitates in decision making and implementation of agency programs as defined by ORS 182.535 Section 7?

By focusing on equity and transparency, the bill seeks to create a more inclusive transportation system that reflects the needs and priorities of all Oregonians, especially those who have historically been marginalized in transportation policy. ODOT involves the public in important decisions by providing for early, open, continuous and effective public participation in and access to key planning and project decision-making processes. Outreach and engagement efforts are tailored specifically to EJ communities that could be potentially impacted by projects. ODOT documents outreach, feedback and input received and the disposition of that feedback. Any analysis of impacts to EJ communities considers benefits and mitigation, as well as impacts, to determine EJ findings for a project. ODOT not only listens but also actively incorporates the views of impacted communities throughout all stages of transportation decision-making.

There are several examples of meaningful involvement conducted by **PTD** and by local partners who receive funds through PTD. The **Innovative Mobility Program (IMP)** disperses grant funding to community organizations who implement projects based on the needs of their communities. Mid-Columbia Economic Development District, through an IMP funded microgrant, provided public transit system education and subsidized fare to the Native American Community in the Columbia River Gorge. Blanchet House of Hospitality provided free monthly bicycle repair clinics that supported people experiencing homelessness and extreme poverty. Wallowa School District installed bicycle racks at the school and distributed locks to students; Wallowa School District reported that the number of students riding bicycles to schools increased.

The **Rogue Valley Transportation District**, through a grant funded by the Transportation Options (TO) Program, held several bilingual outreach events in communities with many Spanish speakers, including an educational event for Spanish-speaking employees of a food manufacturer in rural Jackson County. The Rogue Valley Transportation District also hosts weekly volunteer bike work parties to rebuild bikes for Ashland-area veterans in need of transportation.

The **Mid-Columbia Economic Development District**, through a grant funded by the TO Program, conducted outreach to vulnerable populations by setting up tables at key local events including Dia de la Tierra (Earth Day) in The Dalles, a Juneteenth celebration in Hood River, and the Gorge Festival of Nations, an event celebrating the history of the tribes of the Columbia River Gorge.

In 2024, the **TO Program** completed a 5-year action plan with actions focused on increasing the TO Program and its partners' education and engagement with vulnerable populations. One action is to explore the feasibility of transportation wallet pilot programs in Oregon, which would provide funding for people with low incomes in targeted areas to access public transit, bikeshare and other transportation options in certain communities through community partnerships.

PTD also manages four advisory committees that include representatives from many partners and communities. For example, the Safe Routes to School Advisory Committee includes statewide non-profits and youth members. The Oregon Bicycle Pedestrian Advisory Committee includes members that experience disabilities. The Public Transportation Advisory Committee includes tribal members and members that experience disabilities.

ODOT's **Transportation Planning Unit** supports the development, refinement and implementation of statewide multi-modal transportation plans. In performing these functions, the unit complies with state and federal rules and regulations tied to environmental justice, including [Land Use Goal 1: Citizen Involvement](#), and federal regulatory compliance around environmental justice and Title VI of the Civil Rights Act. The unit incorporates a robust public engagement program when performing major updates to statewide plans.

The recent update to the OTP is a prime example. Unit staff led the public engagement processes throughout development of the plan. The OTP public outreach effort was a commitment from the onset to reflect the voices and perspectives of people and communities who have been historically excluded and underserved by transportation investments. The OTC officially adopted the final draft OTP on July 13, 2024. As part of the engagement process, the project used a variety of strategies to provide accessible opportunities to create awareness and encourage participation; this was discussed in more detail in Section 1 of this report.

Other notable initiatives for meaningful involvement in ODOT activities include:

- **Transportation Options:** ODOT encourages the public and its employees to maximize their transportation options for commuting and all travel activities. ODOT's related goal is to reduce single occupancy vehicle trips and lower the vehicle miles traveled from commute and other vehicle trips.
- **Equitable workforce development** is an essential component in the creation of a sustainable transportation system that makes access to the system and employment opportunities available for all demographics and all geographic areas of the state.

- **The Sustainability Program** also provides required updates to the Oregon Sustainability Board every two years. The **Oregon Sustainability Board** was created in 2001 and encourages activities that best sustain, protect and enhance the environment, economy and community for the present and future benefit of Oregonians. The Governor appoints Board members who represent a variety of partners in Oregon.
- **ODOT's Office of Equity and Civil Rights (OECR)** is committed to ensuring Oregon small business enterprises can contract across ODOT business lines. OECR administers and implements a wide variety of state and federally funded programs to build the capacity of small business to compete for ODOT contracts to advance the economy and strengthen communities across the state.
- The **Climate Office** seeks to provide meaningful involvement in decision making and implementation through engagement and outreach as part of program and project development, and through reporting on progress towards outcomes and goals. In CFEC, the updated **Transportation Planning Rule** requires meaningful involvement of underserved populations and external partners as a regular part of transportation system planning and ODOT provides technical support for this work.

ODOT's [VisionEval model](#) supported the two-year, statewide collaborative effort to develop Oregon's guiding document for reducing transportation greenhouse gas emissions, the [2013 Statewide Transportation Strategy](#) (STS). The STS quantifies a mix of actions needed to achieve the state's required emission reductions. This effort applied the [award-winning](#) strategic planning model, originally developed at ODOT. VisionEval has been adopted and applied by the Federal Highway Administration and several agencies across the United States. In 2023, ODOT and partners released the [Oregon Transportation Emissions website](#), which used VisionEval to track greenhouse gas emissions reduction progress relative to the STS roadmap.

Sustainability is an ODOT priority that guides decision-making. Managers and section crews routinely look for ways to utilize sustainable products and fuels, reduce energy and water consumption and reuse and recycle materials and equipment. Sustainable practices are incorporated into how ODOT plans, designs and builds transportation programs and projects. Agency actions have increased efficiencies, lowered costs and lessened the impact on the environment.

ODOT is involved in the infrastructure deployment for the National Electric Vehicle Infrastructure (NEVI). The Plan will ensure compliance with State and Federal civil rights laws, including title VI of the Civil Rights Act and accompanying USDOT regulations, the American with Disabilities Act and Section 504 of the Rehabilitation Act. Title VI of the Civil Rights Act of 1964 mandates 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. Key activities to effectively address title VI concerns includes conducting meaningful public participation and engagement throughout the project planning and development process and evaluating the impacts and benefits of programs considering the demographics of affected communities, to avoid disparate impacts and provide equitable access to benefits. The existing ADA standards address many aspects of accessibility for buildings and sites applicable to EV charging stations but do not specifically address EV charging stations. To address this gap, in July 2022, the U.S. Access Board issued Design Recommendations for Accessible Electric Vehicle Charging Stations 21. Charging stations should be designed and constructed according to the Access Board's Recommendations to demonstrate ADA compliance and optimize usability for persons with disabilities.

Question Three: Please share agency impacted legislation from the last legislative session where Environmental Justice Council or Environmental Justice Task Force engagement is cited in the legislation.

No bills were proposed or passed in the 2024 Oregon Legislative Session that would affect ODOT's engagement with the Oregon Environmental Justice Council.

There was a **Community Green Infrastructure Grant Program 2024 Report** where ODOT is mentioned:

“As authorized by [ORS 197.470](#), DLCD established points of contact and consulted with the Oregon Health Authority, the Oregon Watershed Enhancement Board, the Department of Environmental Quality, the Oregon Parks and Recreation Department, the Department of Agriculture (ODA), the Oregon Department of Transportation (ODOT) and the Oregon Department of Forestry (ODF) to seek assistance on the design and implementation of the program. Most of DLCD's interagency collaboration has been with ODA, ODOT and ODF.

DLCD and ODOT are collaborating to implement the CGI Program, including finding ways to ensure the success of community green infrastructure projects along the rights-of-way of state highways. Based on ODOT input, the CGI grant application requires applicants to notify and coordinate with ODOT on projects that impact state transportation facilities. DLCD and ODOT will continue to work together to help promote green infrastructure that is compatible with and enhances state transportation facilities”.

ODOT was also mentioned in a 2024 **Opportunities to Reduce Greenhouse Gas Emissions Caused by Oregon's Consumption Report** (in accordance with HB 3409, 2023):

“Expanding and maintaining public infrastructure, including roads, streets, and Oregon's iconic bridges, also significantly contributes to these embodied emissions. In 2021, nearly 25% of all government consumption-based emissions came from non-residential construction and maintenance. A study of ODOT's greenhouse gas emissions found that approximately half of ODOT's total GHG emissions in FY 2016-2019 were from the concrete, asphalt, and steel used in construction (91,400 MT CO₂e)¹⁹”.

Question Four: How would your agency like to engage with Environmental Justice Council in 2025?

ODOT welcomes continued partnership with Oregon's Environmental Justice Council in 2025 to advance statewide EJ strategies and goals. The Council and environmental justice liaisons from across Oregon's state agencies can count on ODOT's participation and collaboration to fulfill its responsibilities under ORS 182.535, 182.538, 182.542, 182.545 and 182.550.

Specific ODOT activities for engaging with the Council and agencies in 2025 may include:

1. ODOT's Climate Office, Transportation Planning and Urban Mobility Office (UMO) have all offered to present to EJC on how EJ is addressed in climate initiatives, in planning processes or information about equity focused advisory committees like the HAAB or EMAC.
2. The Public Transit Division would like more clarity on what success looks like and how progress can be best communicated.
3. Responsiveness to the Council's inquiries regarding ODOT programs, projects and achievements, as well as participation or monitoring of Council meetings and events.
4. Collaboration and support for Council-directed agency coordination efforts implemented by the Department of Environmental Quality's EJ program and staff.
5. Continued participation in the Council and interagency initiative for development of Oregon's EJ mapping tool.
6. Contributing ODOT staff expertise in transportation development to any initiatives of the Council that include transportation data, goals or strategies such as public participation or environmental impact evaluations.
7. Participation in shared learning with the Council and peer agencies for continual improvement of environmental justice programming in Oregon, including those requirements under state law for natural resource agencies to address and further progress on EJ issues, increase public participation and determine the effect of agencies' decisions on traditionally underrepresented communities.