Environmental Justice
Benefits and Burdens Analysis
for the Illiana Project

Prepared by the Northwestern Indiana Regional Planning Commission, November 2013
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1. Purpose and Background
On Feb. 11, 1994, President Bill Clinton issued an Executive Order on Federal actions to address environmental justice in minority and low income populations. It directed every federal agency to make environmental justice part of its mission by identifying and addressing the effects of all programs, policies, and activities on “minority populations and low income populations.” The order was designed to focus Federal attention on the environmental and human health conditions in minority communities and low income communities with the goal of achieving environmental justice. The order promotes nondiscrimination in Federal programs substantially affecting human health and the environment, and to provide minority communities and low income communities’ access to public information on, and an opportunity for public participation in, matters relating to human health or the environment.

The Northwestern Indiana Regional Planning Commission (NIRPC) is committed to addressing environmental justice in all of its work. As the Metropolitan Planning Organization (MPO) for Northwest Indiana, NIRPC is responsible for planning and programming transportation projects that use Federal funds to maintain and expand the transportation system in the region. Transportation projects have often caused undue burdens on environmental justice communities in the past, and NIRPC’s goal is to prevent such undue burdens from occurring in the future. The purpose of this document is to analyze the proposed Illiana Expressway to determine what benefits and/or burdens the project may have on environmental justice populations in Northwest Indiana.

The Illiana Expressway is a proposed 47-mile, limited access highway that would connect I-55 in Will County, IL to I-65 in Lake County, IN, south of Crown Point, passing between Cedar Lake and Lowell. The Indiana Department of Transportation (INDOT) has requested that the Illiana project be included in NIRPC’s 2040 Comprehensive Regional Plan (CRP) via a plan amendment. To ensure consistency with the CRP and with NIRPC’s commitment to environmental justice, the Illiana project was evaluated using the same Environmental Justice Benefits and Burdens Analysis that was developed for the CRP.

2. Approach
The approach to the environmental justice analysis for the Illiana project was a scaled-down version of the two-step process that NIRPC used for the CRP. Step 1 of the process was outreach. To reach out to environmental justice communities, NIRPC hosted an open house in Gary to discuss the project and to get feedback from members of environmental justice communities. Step 2 of the process was the technical analysis. To complete this step, NIRPC repeated the benefits and burdens analysis that was developed for the CRP to evaluate the Illiana Expressway. Both steps are explained below.

Engagement with Environmental Justice Communities
NIRPC, in collaboration with consultants from Bernardin, Lochmueller & Associates, hosted an Environmental Justice Open House at the Genesis Convention Center in Gary on October 10th, 2013. The purpose of the open house was to listen to what people in environmental justice communities thought of the Illiana Expressway and how they thought the project might affect low income people and people of color. The input from the attendees was used to inform this analysis.

Benefits and Burdens Technical Analysis
The Benefits and Burdens Technical Analysis followed the methodology that was established for the 2040 Comprehensive Regional Plan. Environmental justice populations were identified, and concentrations of the populations were mapped (see map on following page). Two future scenarios, a “baseline” scenario and a “build” scenario were then developed and used to determine the effects of the Illiana on environmental justice populations. The baseline scenario consisted of the 2040 road network that was adopted for the 2040 CRP. The build scenario added the Illiana Expressway to the baseline network. Each scenario was run through the NIRPC transportation model, and the model results were used to analyze the effects of the Illiana on environmental justice populations using 11 performance measures (see page 5 for a list of performance measures).

See Appendix for a summary of the open house and the comments and question responses from attendees.
Performance Measures

For the Benefits and Burdens Analysis, eleven performance measures were evaluated to determine the potential effects of the Illiana project on environmental justice communities:

- Average number of jobs within a 20 minute drive
- Average number of shopping destinations within a 20 minute drive
- Average number of other destinations within a 20 minute drive
- Average travel time for work trips
- Average travel time for shopping trips
- Average travel time for other trips
- Average travel time for all trips
- Percent of population within 20 minutes of a livable center
- Percent of population within 20 minutes of a retail center
- Percent of population within 20 minutes of a hospital

3. Results

As seen in the map on page 4, the location of the proposed Illiana Expressway is far from most environmental justice communities in Northwest Indiana. The results from both the open house and the technical analysis reflect this in that neither indicates that the Illiana will have much of a direct impact on environmental justice communities in the region. The only place where the Illiana might have an impact is in secondary impacts, such as the project shifting development patterns in the region.

Concerns about secondary impacts were voiced at the open house during questions following INDOT and NIRPC presentations, including that the Illiana, if built, will not reduce traffic on the Borman Expressway (I-80/94) and other roadways by a noticeable amount; that it is too far south to make much of an impact on traffic in the north; that the road may draw development – and jobs – away from the urban core; that it promotes sprawl and is against infill development; and that jobs related to the Illiana will not go to people from environmental justice communities.

In the guided Q & A session, many of the above concerns were echoed, such as the Illiana contributing to sprawl and drawing development away from the urban core; that people (especially people from environmental justice communities) will not use it; and that it will not decrease traffic on the Borman Expressway. Some other concerns emerged as well. One attendee was worried that money for local projects could be diverted to fund the Illiana. Another participant said that the only way the Illiana would minimize sprawl is if nobody used it (in other words, if it fails). There was concern also that the Illiana Expressway does not align with the goals and objectives of the 2040 Comprehensive Regional Plan.

The results of the technical analysis show virtually identical outcomes for the baseline and build scenarios. This is most likely due to the fact that the Illiana corridor is located far from concentrated environmental justice populations. Results for the technical analysis and each of the 11 performance measures can be seen in the table on the following page; the impacts for each of the performance measures are miniscule.

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4 “Other destinations” are all destinations other than work and shopping destinations.

5 “Other” trips are all trips that are non-work or non-shopping.

6 The one exception is a concentration of low income people in the southern part of Lowell; however, the map shows e.j. concentrations based on the percentage of people in a given area, so while the percentage may be high, the overall number of low income people in the zone is low.

7 Only concerns that potentially impact environmental justice communities are reported here; other concerns, while they may be valid concerns about the project in general, are not.

8 See EJ Appendix on the NIRPC website for a summation of all the concerns heard at the open house.
4. Conclusion
After conducting outreach and a technical analysis to assess the impacts of the proposed Illiana Expressway project on environmental justice communities, the results indicate that there would be no direct impacts – positive or negative – on these communities. However, there is the potential for the Illiana to exacerbate the problems of disinvestment in urban core communities and increase sprawl, both of which could harm environmental justice communities and would run counter to the goals and objectives of the 2040 Comprehensive Regional Plan. If the project is built, these concerns will need to be addressed in order to avoid or mitigate any burdens on environmental justice communities that may arise.

<table>
<thead>
<tr>
<th>Average number of...</th>
<th>Low Income Population</th>
<th>Minority Population</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>...within a 20 minute drive.</td>
<td>Build</td>
<td>No Build</td>
<td>Build</td>
</tr>
<tr>
<td>jobs</td>
<td>32,375 (13% of total)</td>
<td>32,300 (13% of total)</td>
<td>35,250 (14% of total)</td>
</tr>
<tr>
<td>shopping destinations</td>
<td>2,550 (11% of total)</td>
<td>2,550 (11% of total)</td>
<td>2,900 (13% of total)</td>
</tr>
<tr>
<td>other destinations</td>
<td>29,050 (12% of total)</td>
<td>28,975 (12% of total)</td>
<td>31,875 (14% of total)</td>
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</table>

<table>
<thead>
<tr>
<th>Average travel time for...</th>
<th>Low Income Population</th>
<th>Minority Population</th>
<th>Impact</th>
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</thead>
<tbody>
<tr>
<td>work trips</td>
<td>17.3 minutes</td>
<td>17.4 minutes</td>
<td>19.3 minutes</td>
</tr>
<tr>
<td>shopping destinations</td>
<td>10.8 minutes</td>
<td>10.9 minutes</td>
<td>12.4 minutes</td>
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<tr>
<td>other trips</td>
<td>10.5 minutes</td>
<td>10.5 minutes</td>
<td>12.5 minutes</td>
</tr>
<tr>
<td>all trips</td>
<td>13.7 minutes</td>
<td>13.8 minutes</td>
<td>15.6 minutes</td>
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</table>

<table>
<thead>
<tr>
<th>Percent of population within 20 minutes of a...</th>
<th>Low Income Population</th>
<th>Minority Population</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>livable center</td>
<td>98.9%</td>
<td>98.9%</td>
<td>99.7%</td>
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<tr>
<td>retail center</td>
<td>61.3%</td>
<td>61.2%</td>
<td>65.2%</td>
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<tr>
<td>hospital</td>
<td>91.7%</td>
<td>91.4%</td>
<td>92.1%</td>
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<tr>
<td>university</td>
<td>93.2%</td>
<td>93.2%</td>
<td>96.7%</td>
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