To: Tony Bui, Public Involvement Specialist, NDOR
From: Chris Hassler, Highway Civil Rights Specialist, NDOR
Date: 23 May 2014
RE: Civil Rights Analysis, CN 11450, STPD-63-2(108), Alvo North

Civil Rights Analysis for CN 11450

This project is located in one Census tract in Cass County, just north of the Village of Alvo. There will be a detour for this project which will travel through two additional census tracts and adjacent to several villages.

Limited English Proficiency Analysis:

The Limited English Proficiency data for this project is as follows:

Area	% of Population that Speaks ONLY English	Languages Other Than English Spoken by 5% or Greater of the Total Population*	Population of Area Age 5 or Older
Tract 9657	97.2%	None	About 4,420
Tract 9658	96.9%	None	About 2,770
Tract 9659	99%	None	About 4,730
Village of Alvo	97.2%	None	About 110
Village of Elmwood	96.6%	None	About 660
City of Louisville	98.1%	None	About 1,140
Village of Manley	99.3%	None	About 150
Village of Murdock	94.5%	None	About 240
Village of South Bend	78.8%	None	About 50
City of Weeping Water	99.4%	None	About 1,080

* These figures reflect the population of an area that speaks a language other than English, and also speaks English "Less than Very Well."

The areas through which this project travels are mostly English-speaking. In the areas surveyed, none of the data indicates the presence of an LEP population that reaches the NDOR LEP outreach triggers of 5% or 1,000 persons. No LEP outreach is recommended for this project.

Environmental Justice Analysis:

The Environmental Justice data for this project is as follows:

Area	Minority Population	Hispanic Population	Population Below the Poverty Level
Tract 9657	3.8%	1.6%	4.5%
Tract 9658	3.6%	1.5%	4.7%
Tract 9659	3.4%	1.9%	6.5%
Village of Alvo	0%	0%	26.2%
Village of Elmwood	5%	3.6%	4.4%
City of Louisville	3.9%	1.4%	3.8%
Village of Manley	2.8%	0.6%	8.8%
Village of Murdock	2.1%	1.3%	3.7%
Village of South Bend	3%	0%	9.1%
City of Weeping Water	1.8%	0.7%	5%
Cass County	4.6%	2.4%	5.6%

In general, the areas through which this project and its detour route travel have low populations of minority, Hispanic, and low-income persons when compared to Cass County. In only one instance is the minority, Hispanic, or low-income population of a tract, city, or village meaningfully greater than the figure for Cass County. The Village of Alvo contains a low-income population.

However, despite the presence of a low-income population in the Village of Alvo, there will be no disproportionately high and adverse human health or environmental effects visited upon minority and low-income populations, as defined in USDOT Order 5610.2(a), for the following reasons:

> This project will be constructed using a detour route. The detour route is approximately 31 miles in length. However, multiple county roads of much shorter distance are located adjacent to this project area. It is very likely that traffic on N-63, including Village of Alvo traffic, will use these shorter county roads to bypass the project rather than driving the entire distance around the detour route.
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> Additionally, extensive public notification has been done for this detour route. A public information meeting was held in Alvo on November 14, 2013, at the Village Office. Legal notices were published in the Lincoln Journal Star and the Waverly News two weeks in advance of the

meeting. Highway signs along the project site advertised the public meeting. Meeting notices and project information sheets were widely distributed prior to the public meeting, both by mail and by hand delivery to project area property owners and businesses. The distribution list for these notices included, in part, the following agencies and individuals:

Alvo Village Board Members
Alvo Village Clerk
Alvo Village Fire Chief
Alvo Village Street Commissioner
US Post Office, Village of Alvo

At the public information meeting, only one comment was received regarding the detour route. This comment was from the owner of a business located well outside the Village of Alvo, and the comment did not include concern about issues relating to the low-income population in Alvo.

Right-of-Way is being acquired for this project, but because the project does not extend into areas with minority or low-income populations residing along the project site, the acquisition of property rights will not fall disproportionately (if at all) on these protected populations.

There will be relocations or building removal for this project, but because the project does not extend into areas with low-income populations, any relocations or building removal will not fall disproportionately (if at all) on these protected populations.

Access to adjacent businesses and residences will remain unimpeded.

There will be no isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community

There will be no restrictions of access to essential services. No essential services likely to be used by minority or low-income persons lie along the project site.