



Environmental Justice Policy

October 2020 (ed. Oct. 2020)



Naugatuck Valley Council of Governments

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- ▶ Mark Lauretti, Mayor, Shelton
- ▶ Richard Dziekan, Mayor, Derby
- ▶ Tom Dunn, Mayor, Wolcott
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- ▶ Kurt Miller, First Selectman, Seymour
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Sources of Copies

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| ▶ Phone: (203) 757-0535 | ES Traducciones disponibles bajo petición. |
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Acknowledgments

- ▶ All Photos by NVCOG Staff



Introduction

Mission Statement

The Naugatuck Valley Council of Governments (NVCOG), a nineteen (19) municipality region in central-western Connecticut, is committed to achieving the full, fair, and meaningful participation of minority and low-income populations in its transportation, land use, economic development, and environmental planning processes. To fulfill this commitment, the NVCOG has incorporated environmental justice principles into its planning, programming, and decision-making processes.

What is Environmental Justice?

Environmental justice is the policy and practice which calls for an agency to identify and address disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. It also calls for identifying strategies and techniques for meaningful engagement of populations meeting the needs for environmental justice.

To further the NVCOG's commitment to environmental justice practice, the subsequent guiding principles will be followed:

- ▶ to avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- ▶ to ensure the full and fair participation by all potentially affected communities in the planning decision-making process; and
- ▶ to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.¹

Applicability of this Policy

The environmental justice provisions described in this policy apply to every phase of NVCOG planning decision-making processes, regardless of funding source. This policy also applies to activities of entities using NVCOG funds or facilities. Additionally, this policy applies to all actions of the Central Naugatuck Valley MPO and NVCOG activities on behalf of the Greater Bridgeport-Valley MPO. When requirements from funding sources or partners differ from those in this policy, the NVCOG shall use the more stringent requirement.

Implementation of this Policy

Environmental justice analyses at the project and program levels are the primary means by which NVCOG implements this EJ policy. Standards and steps to guide EJ analysis are found on page 12 of this policy statement.

1 FHWA Environmental Justice FAQ (http://www.fhwa.dot.gov/environmental/environmental_justice_faq/index.cfm)

Council of Governments (COG)

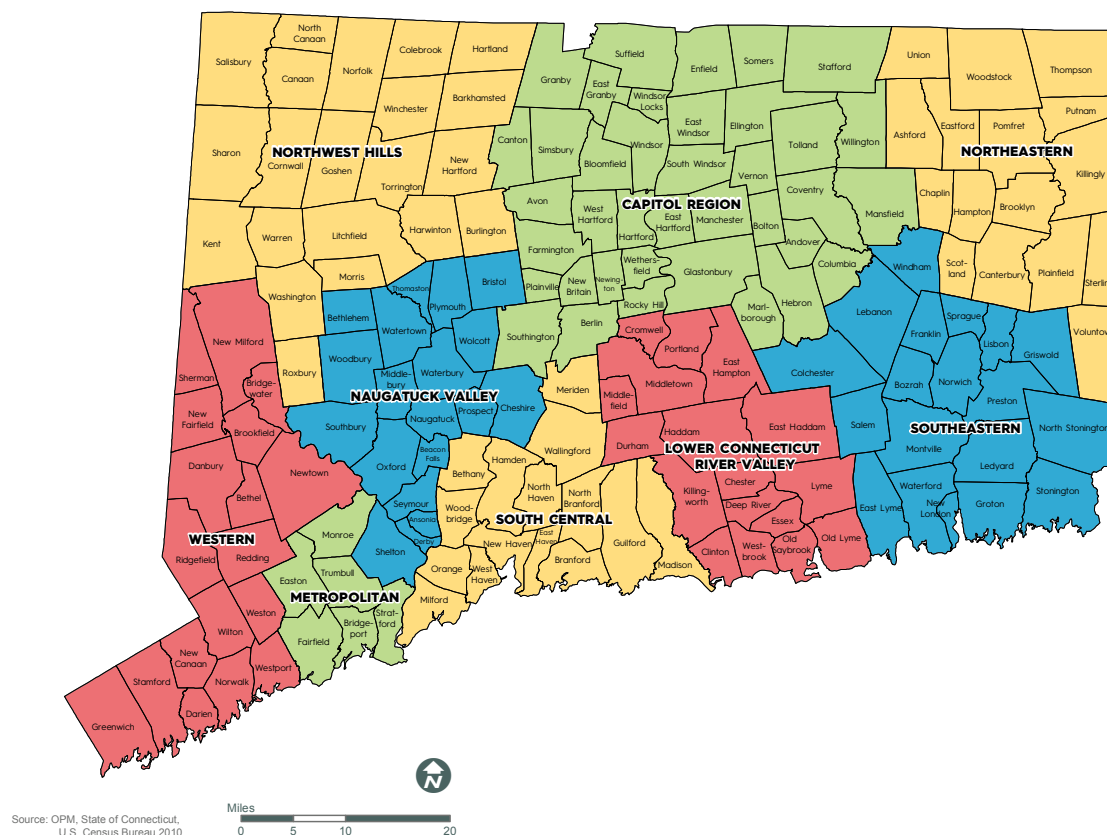
The NVCOG's role as a Council of Governments (or Council) is defined in Connecticut General Statutes Chapter 50 § 4-124i through § 4-124u. The NVCOG's decision-making body is its Council of the Chief Elected Officials (CEOs) of each municipality, or member, in the planning region. Decision-making structures for the Council are defined in the organization bylaws. The Council oversees matters of regional planning and municipal services cooperation, including transportation priorities of neighboring MPO regions (see next section).

As a Council of Governments, the NVCOG's primary planning responsibility is the drafting of a regional planning document known as the Regional Plan of Conservation and Development (POCD). The Regional POCD makes recommendations for "land use, housing, principal highways and freeways, bridges, airports, parks, playgrounds, recreational areas, schools, public institutions, public utilities, agriculture and such other matters as will be beneficial to the area." (Connecticut General Statutes Chapter 127 § 8-35a.) and informs the State POCD.

NVCOG Members

- | | | | |
|----------------|--------------|-------------|-------------|
| ▶ Ansonia | ▶ Derby | ▶ Prospect | ▶ Waterbury |
| ▶ Beacon Falls | ▶ Middlebury | ▶ Seymour | ▶ Watertown |
| ▶ Bethlehem | ▶ Naugatuck | ▶ Shelton | ▶ Wolcott |
| ▶ Bristol | ▶ Oxford | ▶ Southbury | ▶ Woodbury |
| ▶ Cheshire | ▶ Plymouth | ▶ Thomaston | |

Map 1: Councils of Government in Connecticut



Metropolitan Planning Organizations (MPOs)

As a Metropolitan Planning Organization (MPO) host agency, the NVCOG functions as the Central Naugatuck Valley MPO and cooperates with the Greater Bridgeport and Valley MPO on regional transportation planning processes and capital improvement programs for the two aforementioned MPO regions. MPOs are authorized by federal regulations, organized by municipalities as regions and designated by the Governor. MPOs conduct transportation planning and endorse the transportation improvement program for its constituent communities.

The NVCOG solely hosts the Central Naugatuck Valley MPO (CNVMPO), and as such all CNVMPO activities must conform to this environmental justice policy. The NVCOG shares hosting responsibility with MetroCOG, the RPO for Greater Bridgeport, for four NVCOG member municipalities in the Greater Bridgeport-Valley MPO (GBVMPO): Ansonia, Derby, Seymour, and Shelton. NVCOG activities that incorporate these four municipalities must still conform to this environmental justice policy, but MPO-related activities in these four municipalities must also conform to Greater Bridgeport-Valley MPO policies.

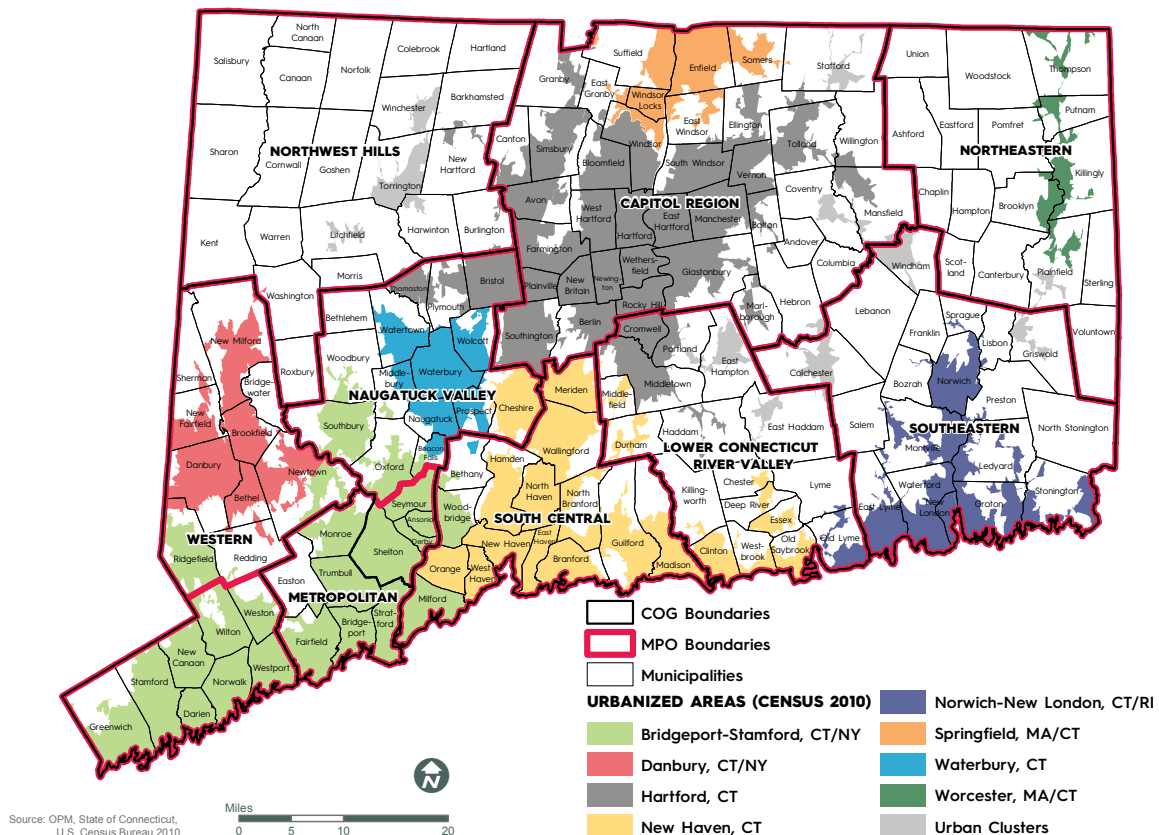
CNVMPO Members

- | | | |
|----------------|-------------|-------------|
| ▶ Beacon Falls | ▶ Naugatuck | ▶ Thomaston |
| ▶ Bethlehem | ▶ Oxford | ▶ Waterbury |
| ▶ Bristol | ▶ Plymouth | ▶ Watertown |
| ▶ Cheshire | ▶ Prospect | ▶ Wolcott |
| ▶ Middlebury | ▶ Southbury | ▶ Woodbury |

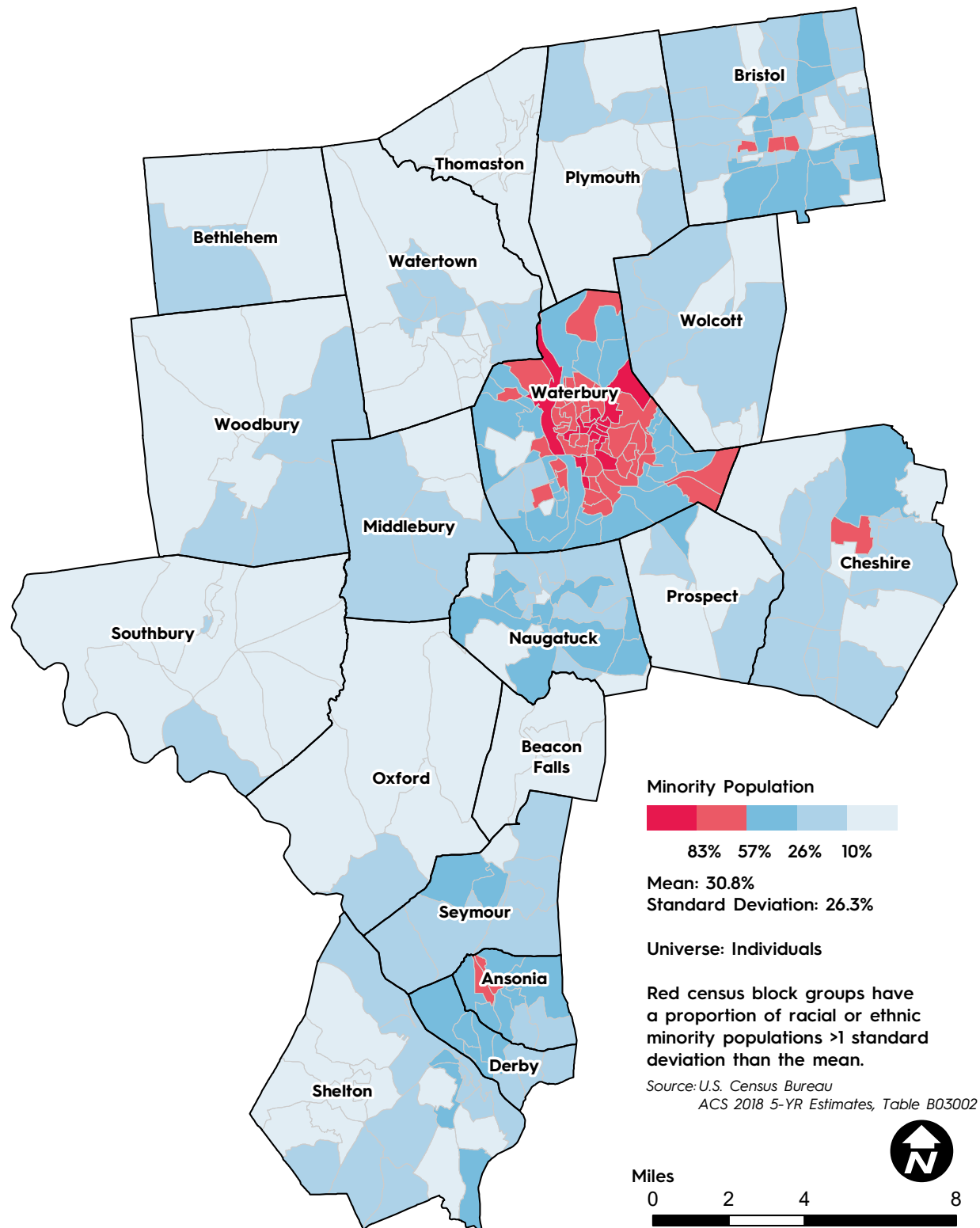
GBVMPO Members

- ▶ Ansonia
- ▶ Derby
- ▶ Seymour
- ▶ Shelton

Map 2: MPOs and Urbanized Areas in Connecticut



Map 3: Minority Population in the Naugatuck Valley COG, 2018



Environmental Justice Populations

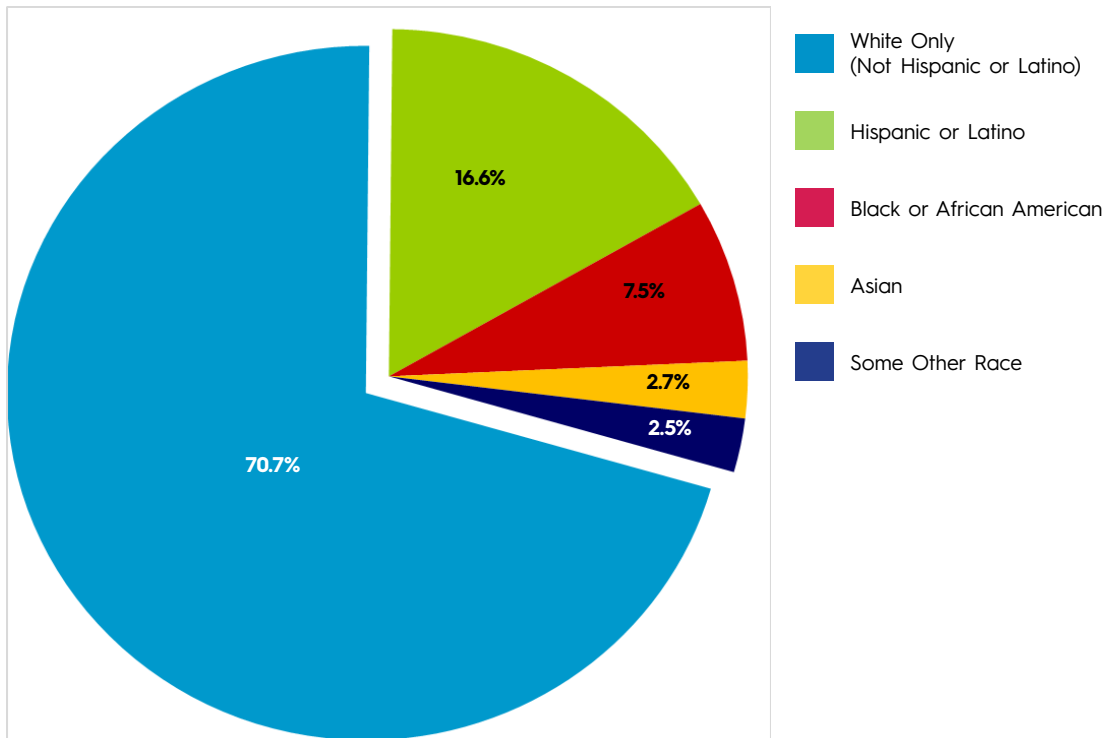
Environmental justice (EJ) populations are described in Executive Order 12898, and consist of minority populations, low-income populations, or both. To identify the location of these populations, the NVCOG uses the most recent block group level survey data collected through the American Community Survey and published by the U.S. Census Bureau.

Minority

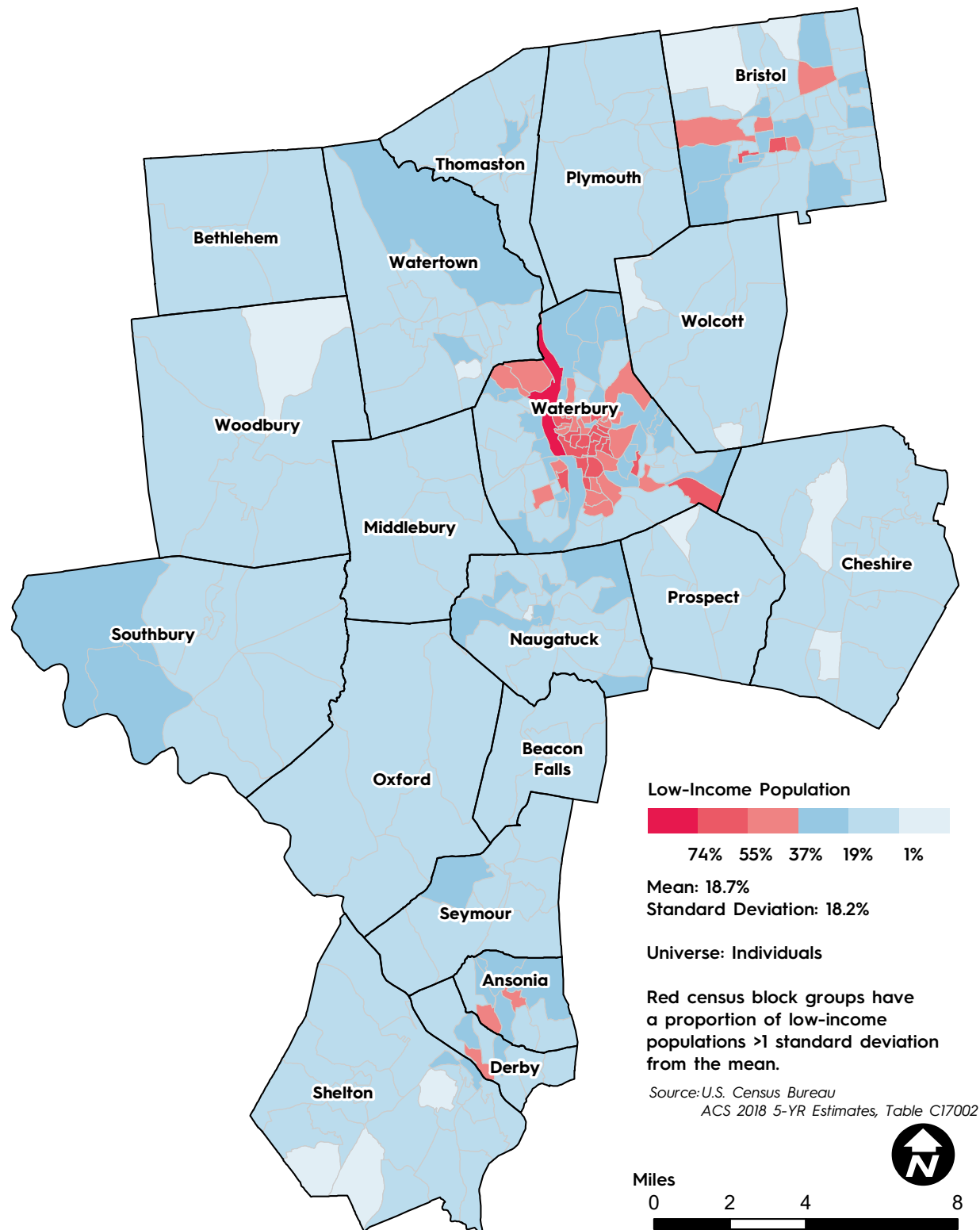
The NVCOG has found concentrations of racial and ethnic minority populations in the City of Waterbury (Map 3). Many census block groups region-wide have very high proportions of minority populations, with a mean proportion of 30.8%. Well over half of the census block groups in Waterbury are minority-majority, where the population is composed of less than fifty percent (50%) non-Hispanic whites. (Region-wide, racial and ethnic minorities make up 26.3% of the population.)

Of the region's population, 16.6% (73,941) identify as Hispanic or Latino, while 7.5% (33,671) identify as Black or African-American and 2.7% (11,865) identify as Asian.

Minority Population in the Naugatuck Valley COG, 2018



Map 4: Low-Income Residents in the Naugatuck Valley COG, 2018



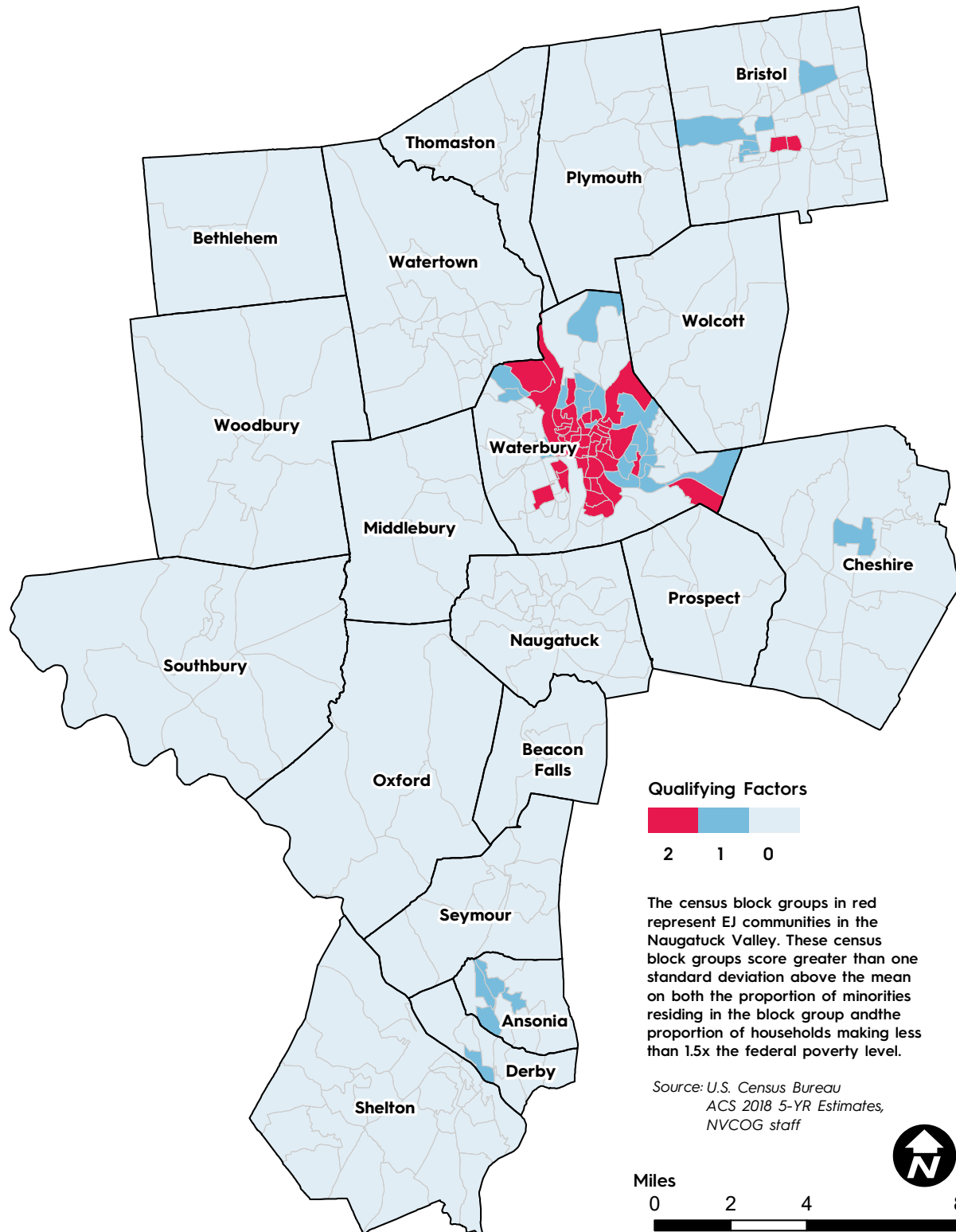
Low-Income

The NVCOG defines "low-income" residents as members of households with a median household income less than 1.5x the federally-defined poverty threshold, which is dependent upon the size of the household. For example, the most common household arrangement in the Naugatuck Valley COG is a married couple with a single child. The federal government defines this household as living at or below the poverty threshold if their annual earnings are equal to or less than \$21,720. The NVCOG's low-income threshold would multiply this federal income figure by 1.5, resulting in a low-income threshold of \$32,580 annual household earnings.

Low-income populations are concentrated in central Waterbury (Map 4), however this concentration is not as pronounced as the concentration of the minority population. There are also several census block groups in Ansonia and Bristol with a majority of their residents below the NVCOG's low-income threshold.

Of 446,048 individuals in the region, 47,343 (10.6%) fall below the federal poverty threshold. Median household income for the region is \$71,738, while median family income is \$89,846.

Map 5: EJ Communities in the Naugatuck Valley COG, 2018



EJ Communities

EJ communities are census block groups where disproportionately large populations of minorities and low-income residents reside. The NVCOG's planning and programming should consider all EJ populations regardless of their concentration to identify and rectify adverse and disparate impacts on these populations, however these EJ communities are areas of particular concern due to their concentrated need and have been identified for the location of beneficial projects and program activities.

The NVCOG's identified EJ communities for FFY 2020 are shown in red on Map 5 (page 8).² A more detailed map of Waterbury and the identified EJ communities, overlaid with the existing neighborhood boundaries as defined by the City of Waterbury, is on page 10.

Commuting & Work Patterns

According to 2018 ACS counts, 49,532 residents, or 11.1% of the region's population reside in EJ communities. This marks a substantial increase from 2014 when 27,111 residents (or 6.0% of the region's population) resided in EJ communities. Roughly a quarter of jobs within the NVCOG region are located in Waterbury. Other cities with a high concentration of jobs include Shelton and Cheshire.

Over the past decade, the population working in historic inner ring suburbs of Waterbury such as Watertown and Naugatuck have decreased, while the proportion working in Cheshire and New Haven has risen. About 11% of workers in identified EJ communities commute by transit, much higher than the region as a whole, and 27.3% of households lack access to a vehicle.

Over half of the working population is employed in just three industries: health care and social assistance, manufacturing, and retail trade. Compared to the region as a whole, there is a concentration of manufacturing, retail, and food services employment in these communities, and a lack of employment in education.

Educational Attainment & Housing

The population in these communities is somewhat less educated than the region at large, with 5.7% of the population over 25 attaining a college degree compared with 21.2% in the NVCOG region's urban core, 30.4% regionally and 38.9% statewide.³ These education rates have been steady over the past five years, compared with increases in average educational attainment regionally and statewide.

Occupied housing units in these communities are 77.5% renter-occupied, compared with 32.5% renter-occupied regionally. Additionally, 20% of all housing units in these communities are vacant, which is dramatically higher than the 14.3% vacancy rate in the City of Waterbury and the 9.3% vacancy rate regionally.

Who we are:

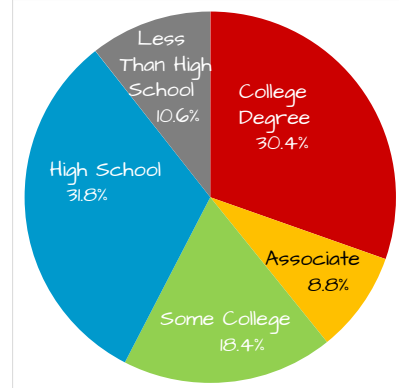
Top 5 Places of Work

1.	Waterbury	25.1%
2.	Shelton	15.8%
3.	Bristol	14.4%
4.	Cheshire	10.0%
5.	Watertown	5.4%

Top 5 Industries

1.	Health Care	18.6%
2.	Manufacturing	12.8%
3.	Government	12.3%
4.	Retail	10.4%
5.	Food Services	6.8%

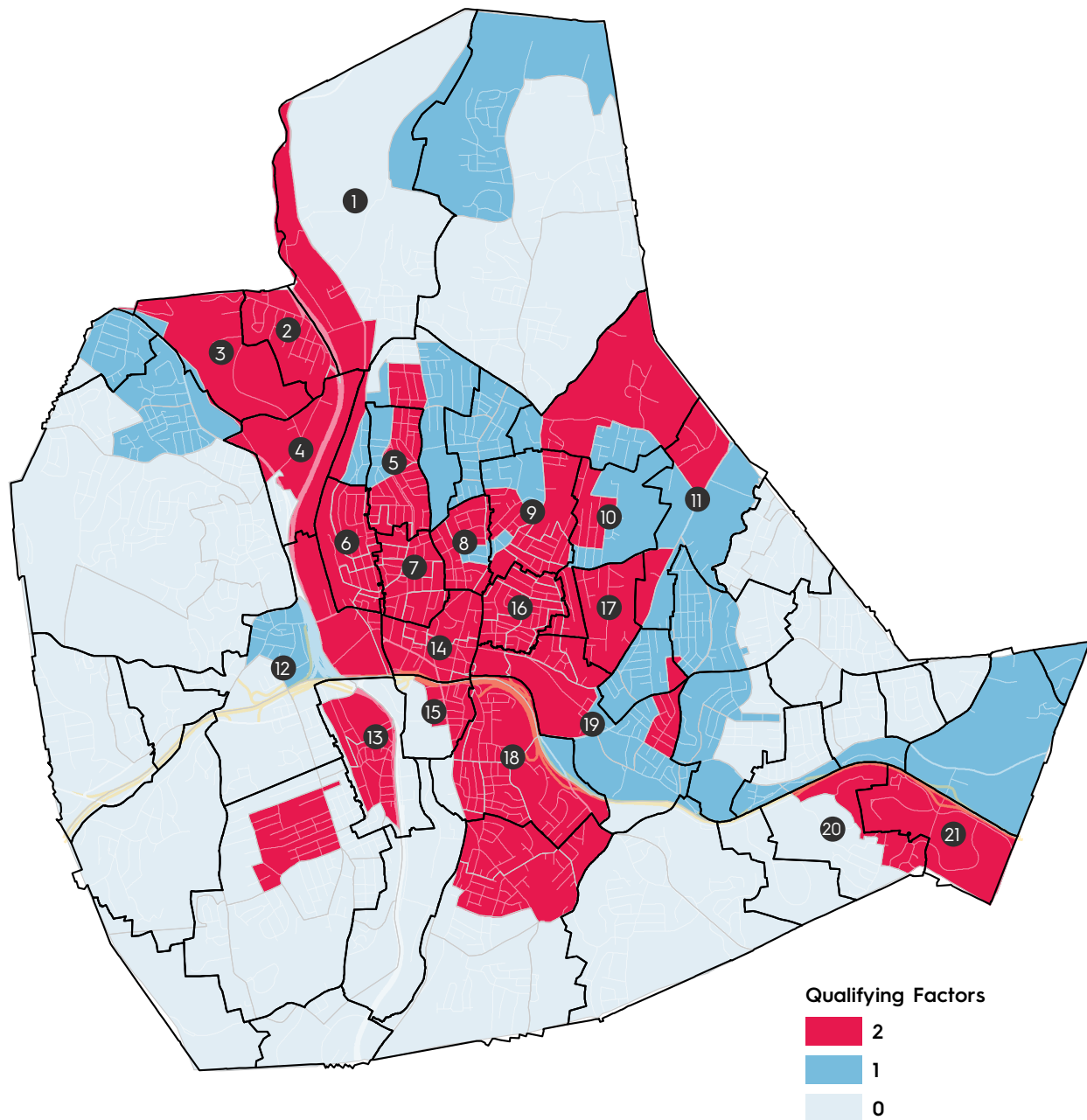
Educational Attainment



Source: U.S. Census Bureau LEHD O-D Employment Statistics, 2019

² The most up-to-date EJ Communities may be found in the Appendix.

³ Naugatuck Valley Regional Profile 2020



Map 6: EJ Communities in Waterbury, 2018

Above is a detailed map of the FFY 2020 EJ communities located in Waterbury, with an overlay of city-designated neighborhood boundaries. Many of these neighborhoods have neighborhood associations which discuss vital issues facing them at regular meetings. When planning for or programming projects that affect these regions, existing neighborhood organizations should be considered a primary resource for outreach. Neighborhoods with asterisks represent Neighborhood Revitalization Zones, a special state designation.

- | | |
|----------------------------|-----------------------------|
| ① Waterville | ⑫ West End |
| ② Fairmount | ⑬ Brooklyn* |
| ③ Brookside Ind. Park | ⑭ Central Business District |
| ④ Browns Meadows | ⑮ South End |
| ⑤ Overlook | ⑯ W.O.W.* |
| ⑥ St. Margaret/Willow Pl.* | ⑰ Berkeley Heights |
| ⑦ Hillside | ⑱ Washington Hill |
| ⑧ Crownbrook | ⑲ East End |
| ⑨ New PAC | ⑳ Scott Road |
| ⑩ North End | ㉑ Capt. Neville Ind. Park |
| ⑪ Wolcott Road | |

Partnerships

The NVCOG will work to incorporate the needs of EJ communities and EJ populations in all aspects of its planning and programming activities. To better understand the needs and potential effects of the NVCOG's activities on these neighborhoods and populations, it is helpful to build relationships with community leaders and representative organizations. The NVCOG has begun building a list of agencies and community organizations for direct public outreach regarding the NVCOG's activities in their neighborhoods or affecting their constituencies:

Organization Name
Brooklyn Neighborhood Association
CT Department of Public Health
DEEP Environmental Justice Program
Main Street Waterbury
Hispanic Coalition of Greater Waterbury
Huntington Woods Apartments
Greater Waterbury United Way
Lakewood Neighborhood Association
Naugatuck Valley Health District
Northwest Workforce Investment Board
Valley United Way
Waterbury Neighborhood Council
Waterville Community Club
Walnut-Orange-Walsh NRZ

In addition to the above list, the NVCOG maintains a mailing list with a broad range of organizations, non-profits, and stakeholders which should be notified of the NVCOG's programs and plans.

Transit Dependence

The NVCOG, in its activities as an MPO and a COG, participates in transportation planning and programming for populations which depend on publicly-funded transportation for accessibility. These populations are typically not included as EJ populations. For reference, the NVCOG has identified the locations of transit-dependent populations in the region using two metrics: the proportion of the working population who commute via means other than a private automobile, and the proportion of households lacking access to an automobile. These two measures provide very different pictures because a large number of retirement communities and senior centers are located in rural areas and transit options vary across the NVCOG region. Maps of these populations may be found in the Appendix.



Environmental Justice Analyses

The key means of implementing the NVCOG Environmental Justice Policy is to incorporate economic justice impact analyses into projects and programs. To ensure these analyses are performed accurately and consistently, the NVCOG has created the following standards for the project- and program-level analyses. When considering impacts of a program or project, all phases must be considered from staging through construction to completion and review.

Project-Level Environmental Justice Analysis

Because projects are generally more localized than programs, project impacts on EJ communities are more tangible and measureable than program impacts. As such, a quantitative method is often the best method to analyze projected and actual impacts. When picking a unit of spatial analysis, such as a census tract or census block, consistently use that unit when identifying populations negatively and positively impacted.

- 1. Spatially identify project area(s).**
Outline the spatial boundaries of the project including all staging areas.
- 2. Spatially identify population(s) most negatively impacted by project.**
Using the most current spatial and demographic data available, identify and spatially outline the populations and neighborhoods which may be most negatively impacted by the staging, construction, and post-construction phases of the project. Negative impacts could include, but are not limited to, the following: noise, pollution, increased travel times, decreased accessibility, increased cost of parking or transit fares, and other environmental side effects.
- 3. Spatially identify population(s) most positively impacted by project.**
Similar to step 2, use data to identify and spatially outline populations and neighborhoods which may benefit from the project. Positive impacts include, but are not limited to, the following: decreased travel times, increased sales for local businesses in the construction area, increased choices of transit modes, and increased variety of public transit destinations.
- 4. Evaluate if any of the positively and negatively impacted populations are also EJ populations.**
Use the grid below to determine if the spatially identified population(s) are also EJ populations using the following demographic characteristics:

Figure 1. Population Characteristics

	Minority	Non-Minority
Low Income	✓	✓
Non-Low Income	✓	X

If the answer is "yes," proceed to step 5 to learn from the community about the project's potential positive and negative impacts.

If the answer is "no," then no further EJ analysis is needed. Record the work you have done thus far and file it with the project documentation.

5. Learn more about the potential negative impacts to EJ populations.

Engage EJ populations through multiple communication channels to better understand the potential negative and positive impacts of the proposed project, and to identify potential mitigating actions or project alterations. Methods to engage communities are detailed in the [NVCOG Public Outreach Policy](#).

6. Identify any disparate impacts on EJ populations.

Compare the negative impacts on EJ populations with those on non-EJ populations to discern if EJ populations are disproportionately-negatively affected. Compare these negative impacts with positive impacts on EJ communities.

7. Identify mitigating actions or project alterations to be included in the project.

Consider the mitigating actions described by the affected EJ populations and identified by NVCOG staff. Mitigating actions should directly relate to the disparate impacts, e.g. moving a staging location, providing alternate access for the duration of a project, or making parallel investments in transit improvements. Keep in mind that the reallocation of project resources to a more beneficial project for the EJ population may also be considered a mitigating action. Determine which mitigating actions the project will include and document them.

Program-Level Environmental Justice Analysis

The impacts of the NVCOG's programs and planning initiatives at the program level are region-wide rather than localized, and thus more difficult to quantify. A more qualitative approach is recommended—alongside a spatial analysis—to identify and to better understand the positive and negative impacts of programs on EJ populations. When identifying populations, be certain to use the same spatial unit for those who may be affected positively, negatively, or both.

1. Identify the program's past and anticipated positive impacts and beneficiaries.

Identify anticipated program benefits and the populations which may be affected. If the program has resulted in the development of projects and/or improvements, list them and the populations who have benefitted.

2. Identify the program's past and anticipated negative impacts and the populations affected.

Detail any existing and projected negative impacts and identify the populations affected.

3. Evaluate if any of the positively and negatively impacted populations are also EJ populations.

Use the grid below to determine if the spatially identified population(s) are also EJ populations using the following demographic characteristics:

Figure 1. Population Characteristics

	Minority	Non-Minority
Low Income	✓	✓
Non-Low Income	✓	X

If the answer is "yes," proceed to step 4.

If the answer is "no," then no further EJ analysis is needed. Record the work you have done thus far and file it with the program documentation.

4. Learn more about the program's past and anticipated negative impacts from EJ populations.

Engage EJ populations to better understand the potential negative and positive impacts of the proposed program, and to identify potential mitigating actions or program alterations. Methods to engage the communities are detailed in the [NVCOG Public Outreach Policy](#).

5. Identify and document mitigating actions and program improvements.

Consider the mitigating actions described by the affected EJ populations and identified by NVCOG staff. Mitigating actions should directly relate to the negative impacts, e.g. better outreach to effected populations, redirection of program priorities, a change in the structure of advisory committees, or other actions which could provide a greater voice and benefit to EJ populations.

Transportation Improvement Programs (TIPs)

As the planning agency hosting the Central Naugatuck Valley Region MPO and cooperating with the Greater Bridgeport-Valley MPO, the NVCOG prepares a Transportation Improvement Program (TIP) every four (4) years, programming federal-, state-, and local-aid transportation improvements. The TIP outlines the scheduling of transportation projects. All line-items in the TIP must be individually analyzed using the EJ Analysis processes outlined on pages 12-13. In addition, the TIP as a whole should be analyzed using these processes to discern whether the net effect of the program has a disproportionately negative impact on EJ populations.

Because the TIP is essentially a financial document, the EJ analysis process should include a calculation of whether EJ communities are receiving their fair share of public investment. "Fair share" is defined as a share of dollars which positively impact EJ communities in proportion to their share of the regional population:

$$\frac{\text{EJ Communities Population}}{\text{Total Regional Population}} = \frac{49,532}{446,048} = \mathbf{11\%}$$

To calculate whether the TIP conforms to this fair share determination, total the programmed dollars which positively impact EJ communities, subtract programmed dollars which negatively impact EJ communities, and divide by the total number of programmed dollars to calculate the EJ communities' share of TIP dollars:

$$\frac{\text{Positive Impacts (\$)} - \text{Negative Impacts (\$)}}{\text{Total Programmed (\$)}} = \mathbf{\text{EJ Communities Share}}$$

In addition to the TIP for the MPOs, the NVCOG and its constituent MPOs also cooperate with the State of Connecticut to develop the Statewide Transportation Improvement Plan (STIP). Since the TIP and the STIP are concurrently developed, all projects that are finalized in the STIP must follow the same EJ analyses. The next complete TIP for the NVCOG is scheduled for FY 2024.

TIP Amendments

While the TIP is written every four years, changes in the scope or cost of projects occur frequently. These changes require an amendment to the TIP. Reprioritizations at the state level may also require an amendment to the TIP. The TIP amendment process is necessarily quicker than the TIP development process, but TIP amendments should be vetted through an environmental justice analysis to identify any disproportionate impacts which may arise and whether mitigating actions are necessary. When TIP amendments are requested by the state, any identified disproportionate impacts on EJ populations must be negotiated with the state before approving the TIP amendment.

Unified Planning Work Programs (UPWPs)

The Unified Planning Work Program (UPWP) is similar to the TIP in that it outlays projects the NVCOG shall undertake within a given period (one year), but the UPWP deals more directly with planning processes and deliverables. While work done under the UPWP is more difficult to quantify, and its impacts are less immediately apparent, it is important to consider environmental justice during the development and implementation of the UPWP. To incorporate the principles of environmental justice into the UPWP, the following procedures are recommended:

1. Incorporate environmental justice analyses into large or impactful deliverables
2. Incorporate environmental justice training for staff
3. Hold UPWP public hearings or public informational meetings in EJ communities

Long-Range Transportation Plans (LRTPs)

The NVCOG is required to create Long-Range Transportation Plans (LRTPs) for the two MPOs in its planning region. LRTPs typically have twenty (20) year horizons, and are used to identify projects for inclusion in the TIP and the UPWP. Additionally, LRTPs serve to identify a unified vision for the direction of transportation planning and infrastructure in the region. LRTPs must conform to the principles of environmental justice by proactively considering the needs of communities and populations of concern, and negative impacts on those communities by otherwise well-intended projects and programs. As such, the LRTP should contain an environmental justice analysis of proposed improvements.

Other Planning & Programs

The NVCOG will work to implement environmental justice principles in other aspects of its planning work. All NVCOG planning staff will be trained in environmental justice analyses and given reference materials. Additionally, all public participation requirements make explicit mention of environmental justice and the need to give additional consideration to EJ populations and communities during all phases of planning: plan development, outreach, and publication.

Updates to This Policy

Updates to this environmental justice policy must conform to the [NVCOG Public Outreach Policy](#). This document qualifies as a Minor Project under the provisions of that policy.

For this policy, a minor technical update includes adjustments to the list of Partnerships and their contact information, adjustments to match changes in other relevant policies which do not affect the principles or goals of this policy, and general technical alterations.

Appendices

- ▶ **Current EJ Communities** (*ed. 10/1/2020*)

- A1: FY 2020 EJ Communities
- A2: FFY 2020 EJ Communities - Waterbury detail
- A3: FFY 2020 EJ Communities - Bristol detail
- A4: Minority Population, 2018
- A5: Low-Income Population, 2018

- ▶ **Additional Maps** (*ed. 10.1.2020*)

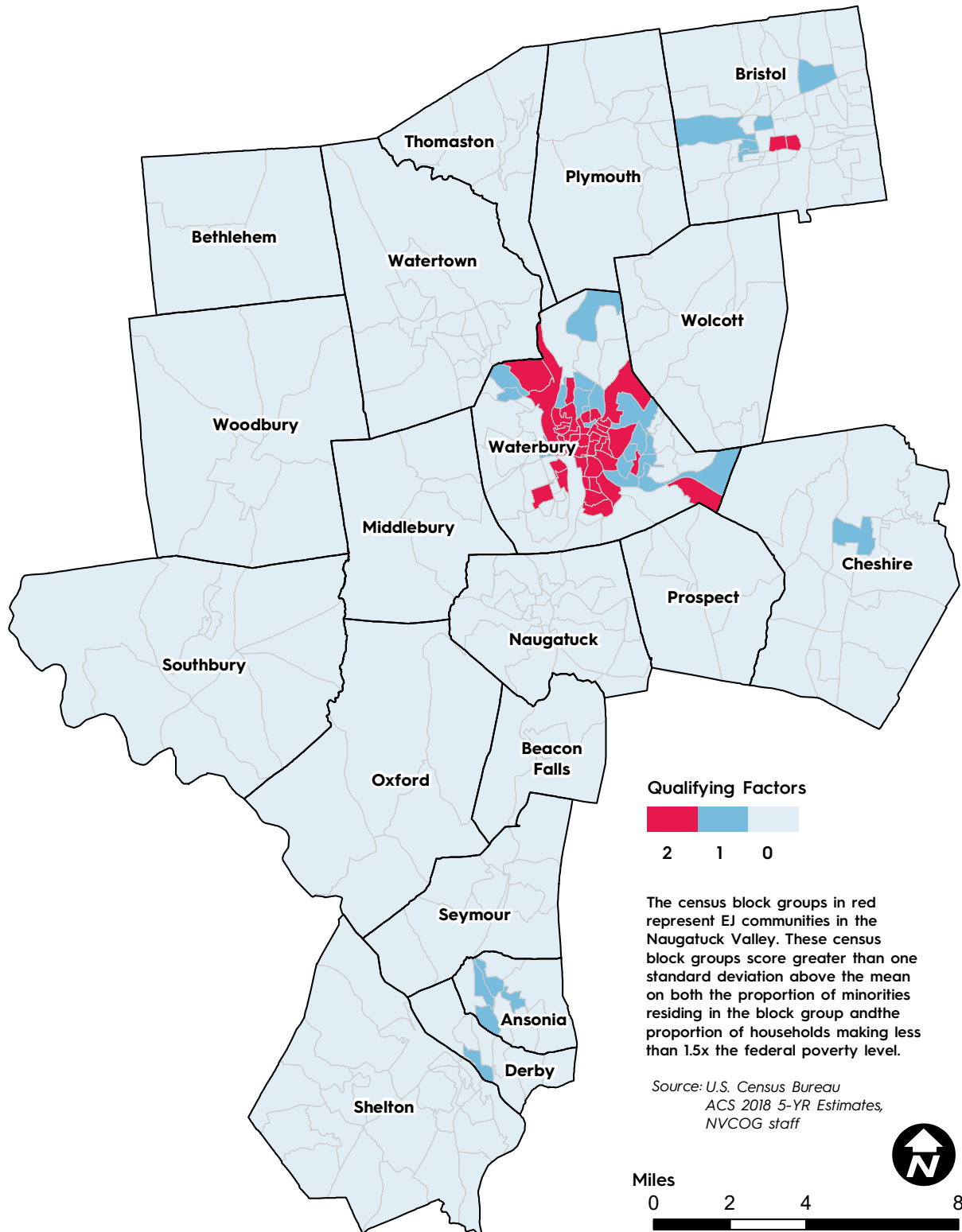
- A6: Transit Commuters, 2018
- A7: Vehicle Access, 2018
- A8: Elderly Population, 2018

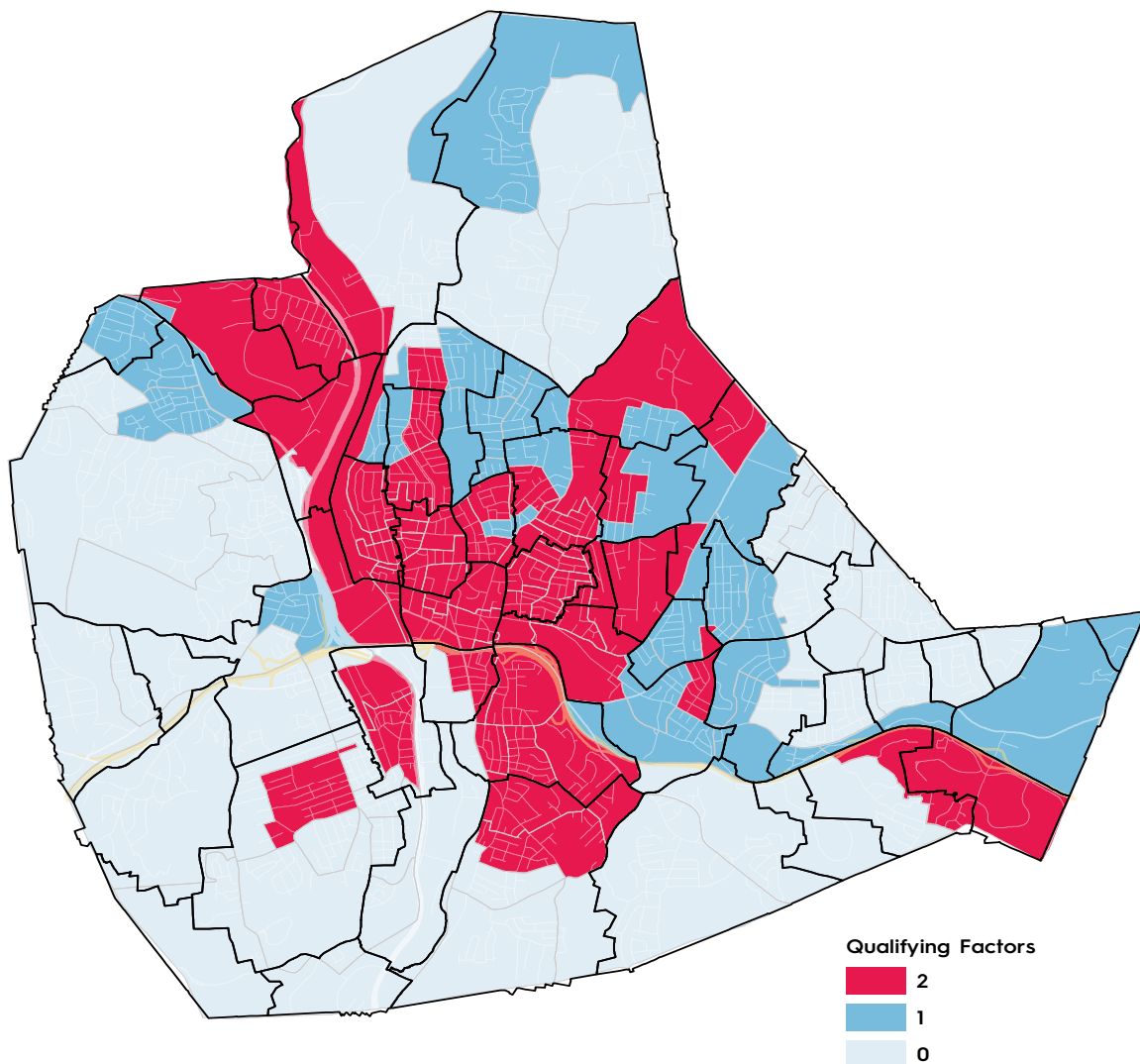
- ▶ **Program EJ Analysis Form**

- ▶ **Project EJ Analysis Form**

- ▶ **NVCOG Resolution**

Map A1: FFY 2020 NVCOG EJ Communities (2018 data)

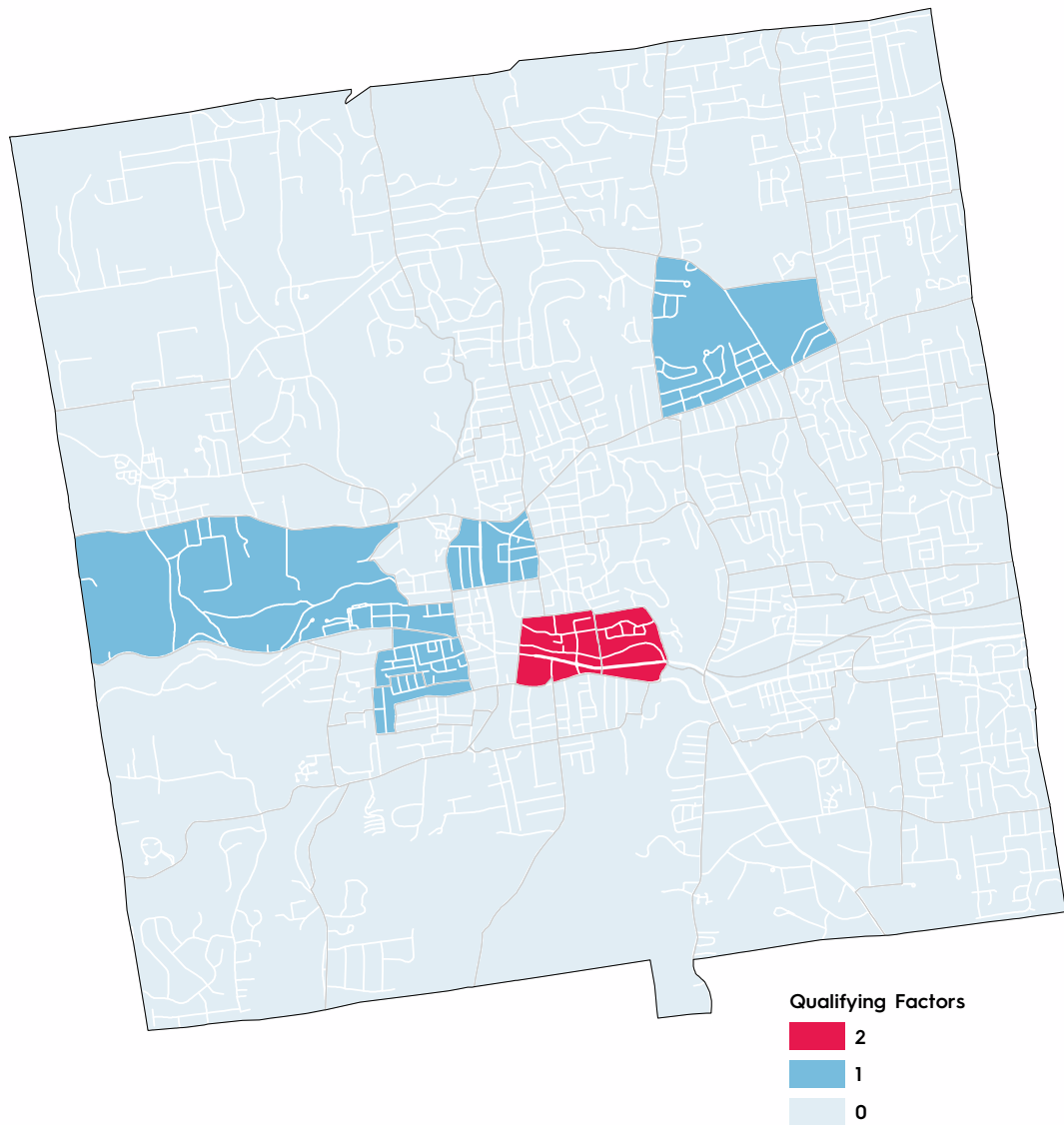




Map A2: EJ Communities in Waterbury, 2018

Above is a detailed map of the FFY 2020 EJ communities located in Waterbury, with an overlay of city-designated neighborhood boundaries. Many of these neighborhoods have neighborhood associations which discuss vital issues facing them at regular meetings. When planning for or programming projects that affect these regions, existing neighborhood organizations should be considered a primary resource for outreach. Neighborhoods with asterisks represent Neighborhood Revitalization Zones, a special state designation. *Additional Communities were identified for FFY 2017.

- | | | |
|--------------------------|----------------|--------------------|
| 1 Berkeley Heights | 12 Hill Street | 23 Washington Hill |
| 2 Boulevard | 13 Hillside | 24 Waterville |
| 3 Bouley Manor | 14 Hopeville | 25 West End |
| 4 Brooklyn* | 15 Lakewood | 26 Willow Plaza* |
| 5 Brookside Ind. Pk. | 16 New PAC | 27 Wolcott Road |
| 6 Browns Meadows | 17 North End | |
| 7 Capt. Neville Ind. Pk. | 18 Overlook | |
| 8 Central Bus. District | 19 Scott Road | |
| 9 Crownbrook | 20 South End | |
| 10 East End | 21 Town Plot | |
| 11 Fairmount | 22 W.O.W. | |

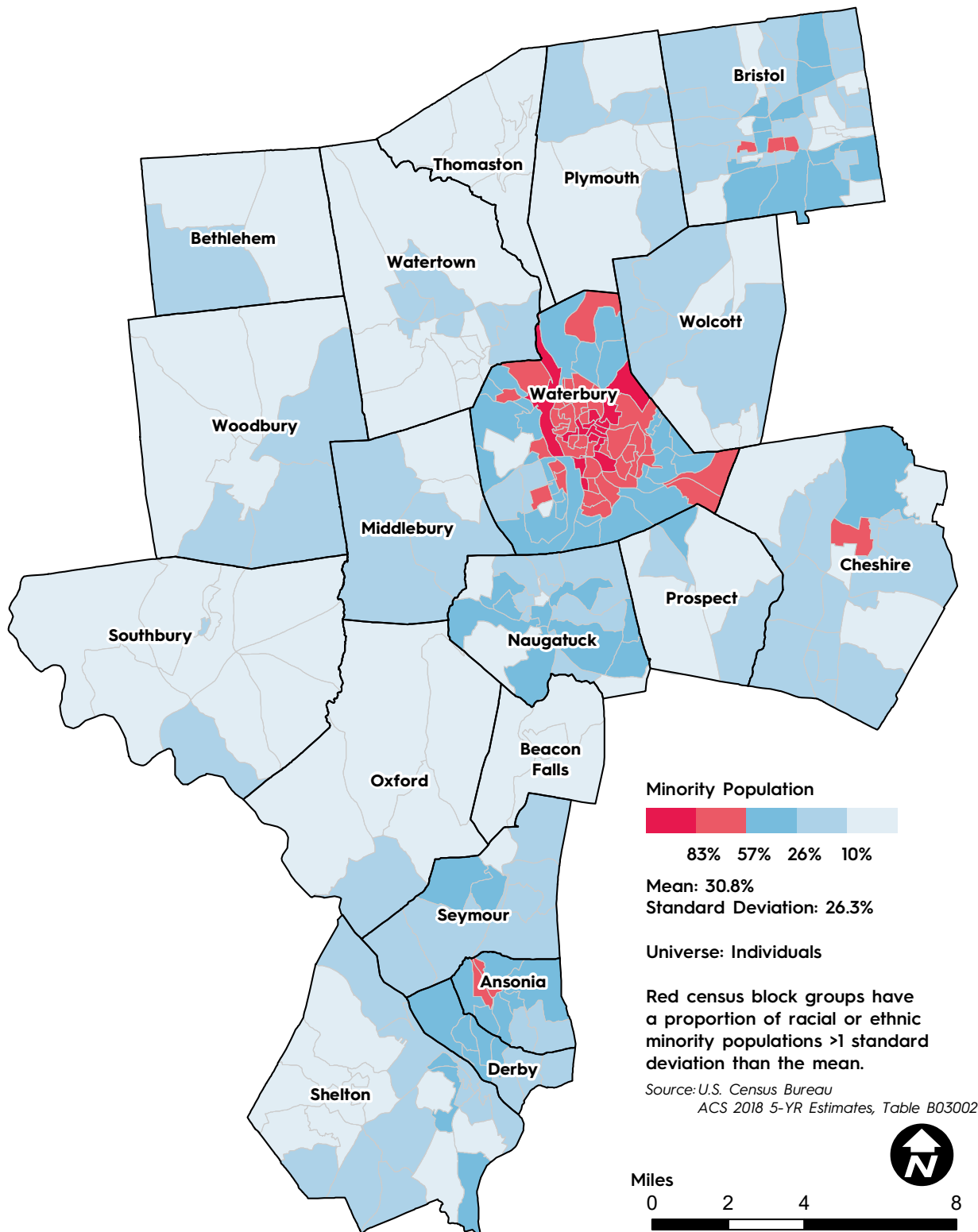


Map A3: EJ Communities in Bristol, 2018

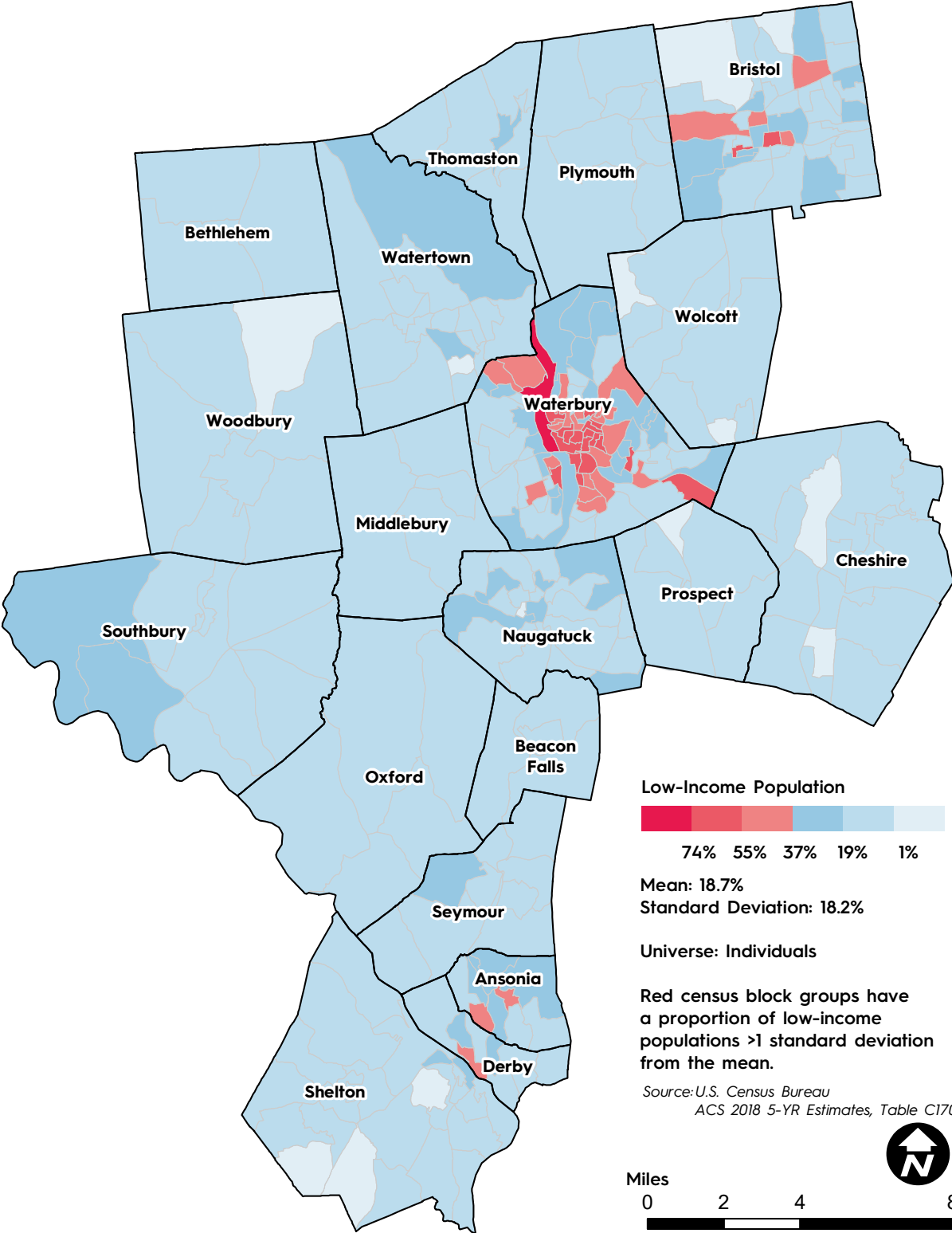
Above is a detailed map of the FFY 2020 EJ communities located in Bristol. Bristol does not have as clearly-defined neighborhoods as Waterbury (Map A2). When planning for or programming projects that affect these communities, NVCOG staff should work with the City of Bristol to identify grassroots organizations and other means with which to coordinate with affected residents.

① Huntington Woods

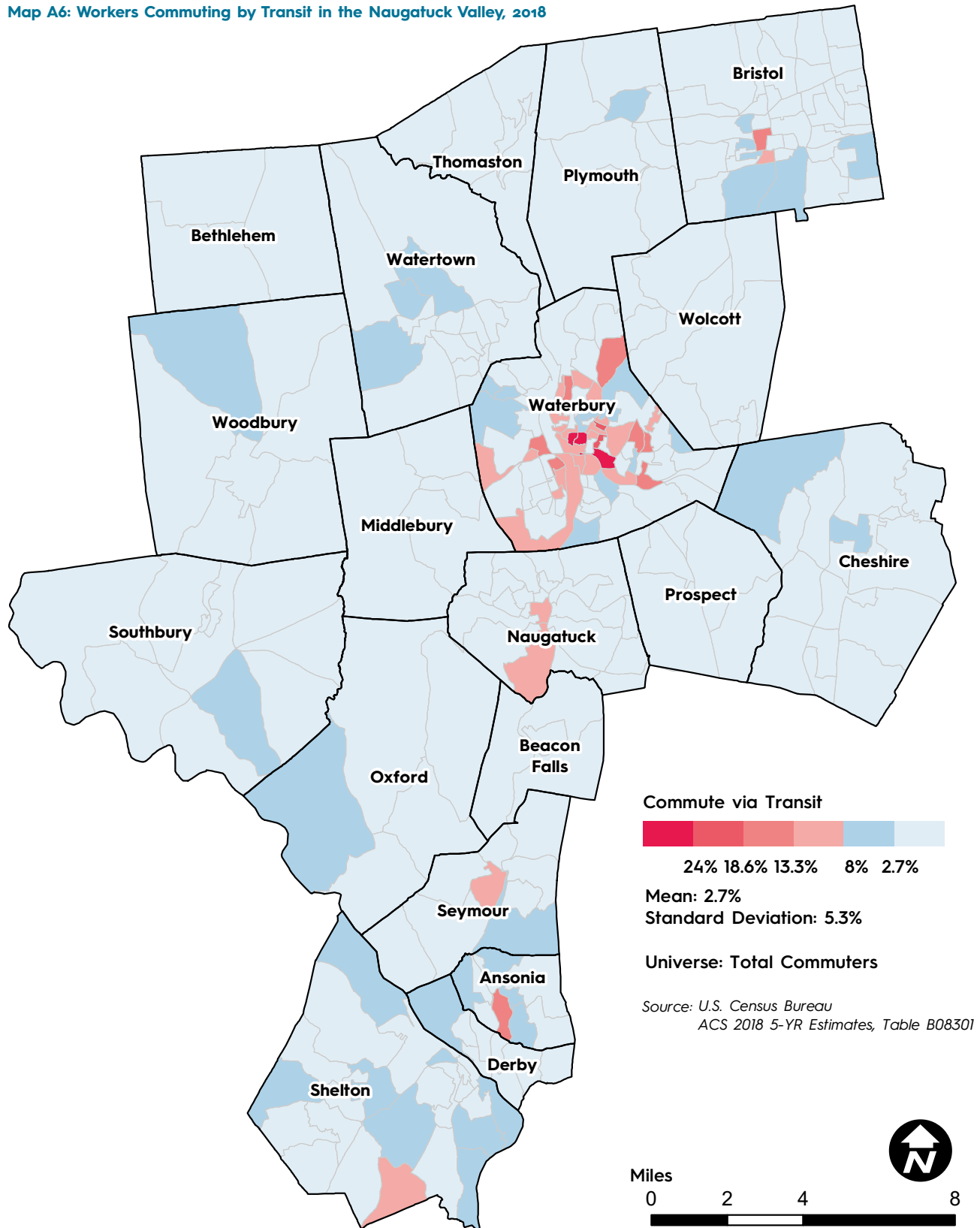
Map A4: Minority Population in the Naugatuck Valley COG, 2018



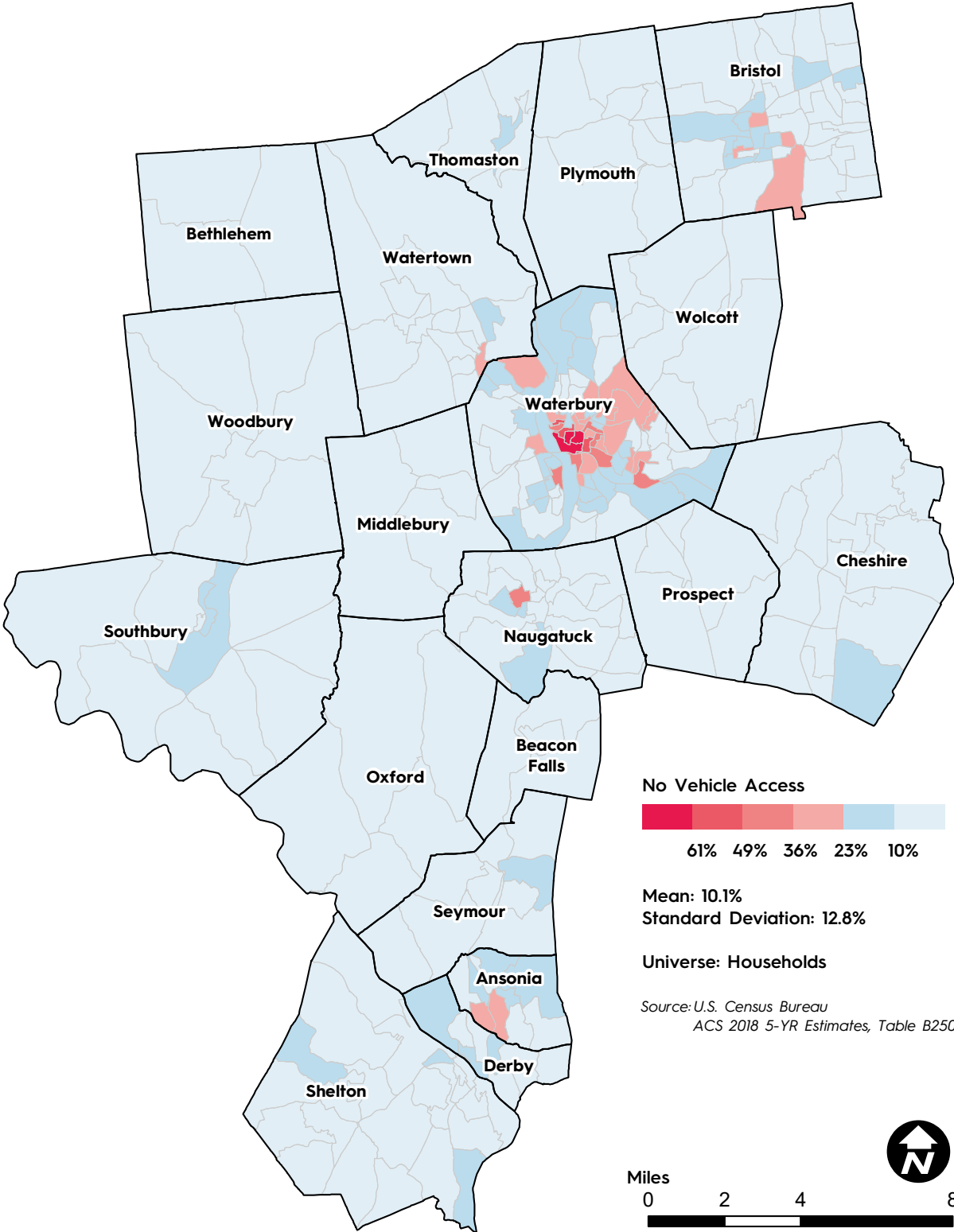
Map A5: Low-Income Residents in the Naugatuck Valley COG, 2018



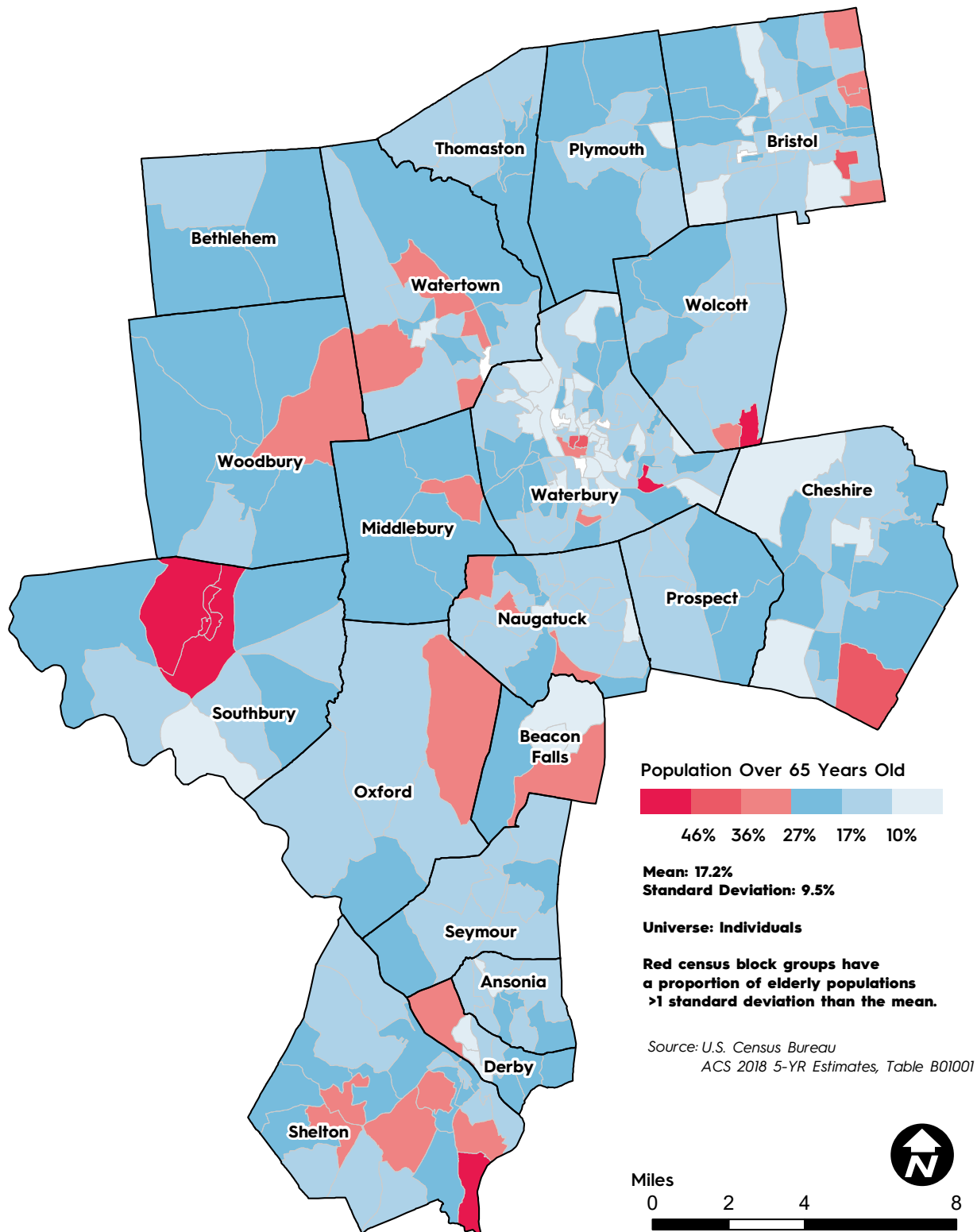
Map A6: Workers Commuting by Transit in the Naugatuck Valley, 2018



Map A7: Households Lacking Vehicle Access in the Naugatuck Valley, 2018



Map A8: Elderly Population in the Naugatuck Valley, 2018



PROGRAM LEVEL

[illegible]

DOCUMENT ENGAGEMENT OF IMPACTED EJ POPULATIONS:

[illegible]

Environmental Justice Analysis

PROJECT LEVEL

PROJECT NAME		FUNDING AGENCY
PROJECT MANAGER	PROJECT NUMBER	FUNDING SOURCE

PROJECT AREA (ATTACH MAP IF NECESSARY):

POSITIVELY IMPACTED POPULATIONS:

NEGATIVELY IMPACTED POPULATIONS:

ANY EJ POPULATIONS IMPACTED? IF **YES**, CONTINUE. IF **NO**, STOP HERE. 🖱️

DOCUMENT ENGAGEMENT OF EJ POPULATIONS:

DETAIL ANY DISPROPORTIONATE IMPACTS:

IDENTIFY AND DOCUMENT MITIGATING ACTIONS:



**NAUGATUCK VALLEY
COUNCIL of GOVERNMENTS**

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RESOLUTION 2017-25

ENVIRONMENTAL JUSTICE POLICY

I certify that the following is a true copy of the vote of the Naugatuck Valley Council of Governments at its meeting on March 10, 2017 in Waterbury, Connecticut, at which a quorum was present.

WHEREAS, the Naugatuck Valley Council of Governments (NVCOG) engages in the funding and project management of large-scale infrastructure projects funded through federal agencies.

WHEREAS, there is an Executive Order that requires projects making use of federal funding to examine and mitigate disproportionate impacts of federally-funded projects on minority and low-income populations.

WHEREAS, NVCOG staff have developed an Environmental Justice Policy informed by Federal regulation, as well as best practice, to guide the NVCOG's analysis and mitigation of environmental justice issues.

BE IT RESOLVED, that the NVCOG approves of the Environmental Justice Policy and its guidance on environmental justice analysis and mitigation processes.

Dated at Waterbury, Connecticut, on March 10,, 2017

Agency: Naugatuck Valley Council of Governments

Signed

Neil O'Leary, Chairman



NVCOG

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